

**DOCKETED**

<b>Docket Number:</b>	79-AFC-01C
<b>Project Title:</b>	Compliance - Application for Certification for PG&E Geysers Unit 17 (78-NOI-3)
<b>TN #:</b>	244303
<b>Document Title:</b>	GPC Unit 17 Basis of Design Narrative 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>	8/3/2022 4:50:54 PM
<b>Docketed Date:</b>	8/3/2022



August 3, 2022

**E-Filed**

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

**RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Basis of Design Narrative (Revision 2) 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 August 1, 2022. This is a revision from the April 22, 2022 BOD Narrative for Unit 17 that was provided to the Commission on April 27, 2022 and approved for confidential designation on May 10, 2022.<sup>1</sup> This August 1, 2022 BOD Narrative also replaces the previously submitted April 22, 2022 version. The August 1, 2022 BOD Narrative is responsive to further comments received from Commission staff after the April 22, 2022 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.”<sup>2</sup> 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 August 1, 2022, contains information that is substantially similar to the previously submitted information that was granted confidential

---

<sup>1</sup> TN# 242988: *CEC Response Letter for Repeated Application for Confidentiality – Geysers Unit 17*, dated May 10, 2022.

<sup>2</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.

designation by your February 2, 2022 letter, and all facts and circumstances relevant to the confidentiality remain unchanged.

I certify under penalty of perjury that the information contained in this Repeated Application is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of GPC.

Sincerely,

/s/

Chase K. Maxwell

E-Mail: [ckm@eslawfirm.com](mailto:ckm@eslawfirm.com)