

<b>DOCKETED</b>	
<b>Docket Number:</b>	80-AFC-01C
<b>Project Title:</b>	Sacramento Municipal Utility District SMUDGE #1
<b>TN #:</b>	246167
<b>Document Title:</b>	220901_GPC Unit 3 BOD and ReCx Rev3_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>	9/21/2022 2:02:59 PM
<b>Docketed Date:</b>	9/21/2022



September 21, 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 and Recommissioning Plan (Revision 3), dated September 20, 2022, for the 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, dated September 20, 2022, 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 this third revision of the BOD & ReCx for Unit 3 for the life of the geothermal project. This Repeated Application is being submitted because this third revision of the BOD & ReCx for Unit 3, dated September 20, 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

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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.

