

**DOCKETED**

<b>Docket Number:</b>	81-AFC-01C
<b>Project Title:</b>	Compliance - Application for Certification of the Occidental Plant # 1
<b>TN #:</b>	249515
<b>Document Title:</b>	Geysers Power Company, Unit 19, Repeated Application for Confidential Designation
<b>Description:</b>	N/A
<b>Filer:</b>	Eric Janssen
<b>Organization:</b>	Ellison Schneider Harris & Donlan LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	3/30/2023 3:28:12 PM
<b>Docketed Date:</b>	3/30/2023



March 30, 2023

**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 (Fourth Quarter of 2022) 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, Lake View (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 fourth 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 fourth quarter of 2022, and the corrective action information accompanying

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<sup>1</sup> 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.

these ITM reports, for two years from the date of the reports. This Repeated Application is being submitted because the ITM reports for the fourth quarter of 2022 and the accompanying cover letters 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. All facts and circumstances relevant to the confidentiality remain unchanged.

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

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
1	Letter to John Heiser from Chase K. Maxwell on behalf of GPC; RE: Fire Protection- 3, Fire Protection-4, and Fire Protection-5  – Submittal of Inspection, Testing and Maintenance Reports for the Fourth Quarter of 2022 for Geysers Power Company LLC plants: Geysers Unit 3, Sonoma (80-AFC-01C); Geysers Unit 17, Lake View (79-AFC-01C); and Geysers Unit 19, Calistoga (81-AFC-01C)	3/30/2023	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 Q4 2022 ITM reports for three GPC plants, and it provides details for the corrective actions taken or to be taken.	6
2	Letter to Keith Winstead from Chase K. Maxwell on behalf of GPC; RE: Fire Protection- 3, Fire Protection-4, and Fire Protection-5  – Submittal of Inspection, Testing and Maintenance Reports for the Fourth Quarter of 2022 for the Geysers Power Company LLC plants: Geysers Unit 16, Quicksilver (79-AFC-05C); Geysers Unit 18, Socrates (79-AFC-03C); and Geysers Unit 20, Grant (82-AFC-01C)	3/30/2023	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 Q4 2022 ITM reports for three GPC plants, and it provides details for the corrective actions taken or to be taken.	4

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
<b>Unit 3 – Sonoma</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00599714)	12/14/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00599713)	12/14/2022*	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	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00599723)	12/14/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00599720)	12/14/2022*	The document reports results of the fourth quarter 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>
<b>Unit 17 – Lake View</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00599726)	12/14/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00599725)	12/14/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
<b>Unit 18 – Socrates</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00599776)	12/14/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00599775)	12/14/2022*	The document reports results of the fourth quarter 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>
<b>Unit 19 – Calistoga</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00599782)	12/13/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Dry Pipe Fire Sprinkler System Quarterly and Annual Report (00599780)	12/13/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
3	Pre-Action Fire Sprinkler System Quarterly and Annual Report (00601196)	12/13/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
<b>Unit 20 – Grant</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00599784)	12/14/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00599783)	12/14/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3

Doc. #	Title	Date	Description	# of Pages
* 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.				

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,

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/s/

Chase K. Maxwell

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