

DOCKETED

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TN #:	252496
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October 3, 2023

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

RE: Elmore North Geothermal Project (23-AFC-02): Repeated Application for Confidential Designation for Data Response Nos. 90 and 94

Dear Mr. Bohan:

Pursuant to Title 20, section 2505(a)(4) of the California Code of Regulations, Elmore North Geothermal LLC (the “Applicant”) hereby submits this Repeated Application for Confidential Designation for the following response to the California Energy Commission’s *Data Requests Set 1 for Elmore North Geothermal Project* (“ENGP”) filed on August 31, 2023:¹

- Response to Data Request Number 90: Imperial Irrigation District (“IID”) BHE Cluster System Impact Study (“SIS”), appendices, and attachments; and
- Response to Data Request Number 94: IID Switching Station One-line Diagram

By letter dated May 1, 2023, the Executive Director approved the initial request for confidential designation of certain documents relating to the BHE Cluster SIS submitted by the Applicant.² The document submitted in response to Data Request Number 90 contains information that is substantially similar to the previously submitted information as it contains further documents associated with the BHE Cluster SIS, including appendices and attachments. All facts and circumstances relevant to the confidentiality of the information remain unchanged; therefore, this data request response should be similarly granted confidential designation on the same basis.

The Applicant believes that the one-line diagram provided in response to Data Request Number 94 also contains information that is substantially similar to that granted confidential designation in the Executive Director’s May 1, 2023 letter. The information relates to the interconnection of the ENGP to the Imperial Irrigation District system and provides schematics for the IID 230-kv switching station. The Applicant understands that IID considers the one-line diagram to be confidential. The CEC should similarly keep such information confidential as nondisclosure of the information will protect against potential misuse of the information for illicit purposes, such as vandalism, tampering, or other third-party imposed damages. The public interest in preventing such acts clearly outweighs the public interest served by disclosure of the information for which the Applicant is seeking confidential designation.

¹ TN#: 252098.

² TN#: 249938.

