

**DOCKETED**

<b>Docket Number:</b>	23-AFC-01
<b>Project Title:</b>	Morton Bay Geothermal Project (MBGP)
<b>TN #:</b>	253839
<b>Document Title:</b>	Applicant's Notice Pursuant to 20 CCR § 1716(f) for CURE Data Requests Set 3
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<b>Submitter Role:</b>	Applicant Representative
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<b>Docketed Date:</b>	1/9/2024

**THE STATE OF CALIFORNIA**

**State Energy Resources Conservation  
and Development Commission**

In the Matter of: )  
Application for Certification for the )  
Morton Bay Geothermal Project )  
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\_\_\_\_\_ )

Docket No. 23-AFC-01

**APPLICANT’S NOTICE PURSUANT TO 20 C.C.R. § 1716(f)  
FOR CURE’S DATA REQUESTS SET 3**

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**STATE OF CALIFORNIA  
Energy Resources  
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**APPLICANT’S NOTICE PURSUANT TO 20 C.C.R. § 1716(f)  
FOR CURE’S DATA REQUESTS SET 3**


Pursuant to Section 1716(f) of the California Energy Commission’s (“CEC’s”) regulations, Morton Bay Geothermal LLC (the “Applicant”) hereby provides this notice of objection to Data Request 246, which was submitted as part of the California Unions for Reliable Energy’s *CURE Data Requests Set 3 for Morton Bay Geothermal Project*.<sup>1</sup>

Data Request 246 requests that the Applicant provide a “redacted version of Data Request Response (“DRR”) 98 - Imperial Irrigation District (“IID”) Switching Station One-line Diagram (TN 252633).” Section 1716(b) of the CEC’s regulations provides that any party may request from an applicant information that is both (1) reasonably available to the applicant and (2) relevant or reasonably necessary to make any decision on the application for certification.<sup>2</sup> In this case, the Applicant has been informed by the Imperial Irrigation District that a redacted version of the IID Switching Station One-line Diagram is not available. Therefore, the Applicant objects to Data Request 246 as requesting information that is not reasonably available to the Applicant. The Applicant also objects to Data Request 246 as requesting information that is confidential, privileged, or constitutes critical energy/electrical infrastructure information.

Dated: January 9, 2024

Respectfully submitted,

ELLISON SCHNEIDER HARRIS & DONLAN L.L.P.

By  \_\_\_\_\_  
Samantha G. Neumyer  
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<sup>1</sup> TN#: 253696.

<sup>2</sup> 20 C.C.R. § 1716(b).

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