

DOCKETED	
Docket Number:	82-AFC-01C
Project Title:	Compliance - PG&E Geysers Unit 20, 82-AFC-01C
TN #:	254915
Document Title:	Repeated Application for Confidential Designation_U20_GPC 2023 FIRE PROTECTION 4 and 5 Compliance Submission
Description:	N/A
Filer:	Deric Wittenborn
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
Submission Date:	3/7/2024 3:25:46 PM
Docketed Date:	3/7/2024



March 7, 2024

E-Filed

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

RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Corrective Actions for Items Identified for Repair or Correction from the 2023 Inspection, Testing and Maintenance Reports for the Fire Protection Systems at the following Geysers Power Company LLC plants:

**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, submits this Repeated Application for Confidential Designations for the corrective actions for items identified for repair or correction in the 2023 fire protection system (“FPS”) inspection, testing, and maintenance (“ITM”) reports, hereinafter “Repeated Application.” The corrective action summaries provide information required by 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 2023 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.”¹ This Repeated Application similarly seeks confidential designation for the corrective action information corresponding to the findings in the ITM reports associated with FPS inspections conducted in 2023 for the two

¹ 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.

year period. This Repeated Application is being submitted because the compliance submittal letters include FPS corrective action tables that contain information that is substantially similar to the previously submitted information that was granted confidential designation by your February 2, 2022 letter. All facts and circumstances relevant to the confidentiality remain unchanged.

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

Doc. #	Title	Date	Description	# of Pages
1	Letter to John Heiser from Chase K. Maxwell on behalf of GPC; RE: Fire Protection-4 and Fire Protection-5 – Corrective Actions for Items Identified for Repair or Correction from the 2023 Inspection, Testing and Maintenance Reports for the Fire Protection Systems at the following 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)	3/7/2024	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 2023 ITM reports for three GPC plants, and it provides details for the corrective actions taken or to be taken.	18
2	Letter to Keith Winstead from Chase K. Maxwell on behalf of GPC; RE: RE: Fire Protection-4 and Fire Protection-5 – Corrective Actions for Items Identified for Repair or Correction from the 2023 Inspection, Testing and Maintenance Reports for the Fire Protection Systems at the following 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)	3/7/2024	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 2023 ITM reports for three GPC plants, and it provides details for the corrective actions taken or to be taken.	12

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