

| <b>DOCKETED</b>         |   |
|-------------------------|---|
| <b>Docket Number:</b>   | 80-AFC-01C  |
| <b>Project Title:</b>   | Sacramento Municipal Utility District SMUDGE #1                               |
| <b>TN #:</b>            | 255356  |
| <b>Document Title:</b>  | GPC Unit 3_2023 ITM Reports_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> | 3/29/2024 11:50:46 AM   |
| <b>Docketed Date:</b>   | 3/29/2024   |



March 29, 2024

**E-Filed**

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

**RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the 2023 Inspection, Testing, and Maintenance Reports, Pursuant to Condition of Certification Fire Protection-3, for 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 2023 fire protection system (“FPS”) inspection, testing, and maintenance (“ITM”) reports, hereinafter “Repeated Application.” The 2023 ITM reports for the above-listed projects are submitted in compliance with Condition of Certification Fire Protection-3.

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 in 2023 for two years from the date of the reports. This Repeated Application is being submitted because the 2023 ITM reports 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.

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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.

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> |
|------------------------|---|--------------|---|-------------------|
| <b>Unit 3 – Sonoma</b> |   |              |   |                   |
| 1                      | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627725) | 03/05/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 2                      | Main Drain Test Continuation Form (00627738)                                | 03/05/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 1                 |
| 3                      | Pre-Action Fire Sprinkler System Quarterly and Annual Report (00627739)     | 03/05/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 4                      | Standpipe and Hose System Quarterly and Annual Report (00627740)            | 03/05/2023   | The document reports results of the first 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> |
|---------------|---|--------------|--|-------------------|
| 5             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627741)       | 03/05/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 6             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627742) | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 7             | Main Drain Test Continuation Form (00627743)                                | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 1                 |
| 8             | Pre-Action Fire Sprinkler System Quarterly and Annual Report (00627744)     | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 9             | Private Fire Service Main Quarterly and Annual Report (00627745)            | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 2                 |

| <b>Doc. #</b> | <b>Title</b>  | <b>Date*</b> | <b>Description</b>   | <b># of Pages</b> |
|---------------|---|--------------|--|-------------------|
| 10            | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627746)       | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 11            | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627748) | 07/22/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 12            | Main Drain Test Continuation Form (00630275)                                | 07/22/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 1                 |
| 13            | Pre-Action Fire sprinkler System Quarterly and Annual Report (00627749)     | 07/22/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 14            | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627750)       | 07/22/2023   | The document reports results of the third 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> |
|---------------|---|--------------|--|-------------------|
| 15            | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627753) | 10/05/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 16            | Main Drain Test Continuation Form (00627751)                                | 10/05/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 1                 |
| 17            | Pre-Action Fire sprinkler System Quarterly and Annual Report (00627752)     | 10/05/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 18            | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627754)       | 10/05/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 19            | Annual Deluge Sprinkler System Report (00628074)                            | 12/12/2023   | The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.         | 15                |

| <b>Doc. #</b>                | <b>Title</b>  | <b>Date*</b> | <b>Description</b>  | <b># of Pages</b> |
|------------------------------|---|--------------|---|-------------------|
| 20                           | Annual Electric Fire Pump Report (00627756)                                 | 03/28/2023   | The document reports annual inspection, testing and maintenance data; including fire pump performance results.                          | 6                 |
| 21                           | Semi-Annual Fire Alarm Inspection Report 2023 (00628064)                    | 07/22/2023   | The document reports results from the semi-annual fire alarm annual inspection and provides other details regarding testing data.       | 2                 |
| 22                           | Annual Fire Alarm Inspection Report (00627758)                              | 03/04/2023   | The document reports results from the fire alarm annual inspection and provides other details regarding testing data.                   | 9                 |
| <b>Unit 16 – Quicksilver</b> |   |              |   |                   |
| 1                            | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00630035) | 03/01/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 5                 |
| 2                            | Standpipe and Hose System Quarterly and Annual Report (00630036)            | 03/01/2023   | The document reports results of the first 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> |
|---------------|---|--------------|--|-------------------|
| 3             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00630037)       | 03/01/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 4             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00630108) | 04/03/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 5             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00630109)       | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 6             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00630123) | 07/17/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 7             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00630124)       | 07/17/2023   | The document reports results of the third 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> |
|---------------|---|--------------|--|-------------------|
| 8             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627651) | 10/04/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 9             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627652)       | 10/04/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 10            | Annual Electric Fire Pump Report 2023 (00627653)                            | 03/28/2023   | The document reports annual inspection, testing and maintenance data; including fire pump performance results.                           | 18                |
| 11            | Semi-Annual Fire Alarm Inspection Report 2023 (00627654)                    | 07/17/2023   | The document reports results from the semi-annual fire alarm annual inspection and provides other details regarding testing data.        | 2                 |
| 12            | Annual Fire Alarm Inspection Report 2023 (00627655)                         | 03/01/2023   | The document reports results from the fire alarm annual inspection and provides other details regarding testing data.                    | 4                 |

| <b>Doc. #</b>              | <b>Title</b>  | <b>Date*</b> | <b>Description</b>   | <b># of Pages</b> |
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| <b>Unit 17 – Lake View</b> |   |              |  |                   |
| 1                          | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627656) | 03/04/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 5                 |
| 2                          | Standpipe and Hose System Quarterly and Annual Report (00627657)            | 03/04/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 3                          | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627658)       | 03/04/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 4                          | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627659) | 04/01/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 5                          | Standpipe and Hose System Quarterly and Annual Report (00627660)            | 04/01/2023   | The document reports results of the second 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> |
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| 6             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627661)       | 04/01/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 7             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627662) | 07/20/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 8             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627663)       | 07/20/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 9             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627664) | 10/04/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 10            | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627665)       | 10/04/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |

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| 11                        | Annual Electric Fire Pump Report 2023 (00627666)                            | 03/28/2023   | The document reports annual inspection, testing and maintenance data; including fire pump performance results.                          | 19                |
| 12                        | Semi-Annual Fire Alarm Inspection Report 2023 (00627667)                    | 07/20/2023   | The document reports results from the semi-annual fire alarm annual inspection and provides other details regarding testing data.       | 2                 |
| 13                        | Annual Fire Alarm Inspection Report 2023 (00627668)                         | 03/03/2023   | The document reports results from the fire alarm annual inspection and provides other details regarding testing data.                   | 4                 |
| <b>Unit 18 – Socrates</b> |   |              |   |                   |
| 1                         | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627929) | 03/04/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 5                 |
| 2                         | Standpipe and Hose System Quarterly and Annual Report (00627930)            | 03/04/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |

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| 3             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627931)       | 03/04/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 4             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627932) | 04/03/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 5             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627933)       | 04/03/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 6             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627934) | 07/19/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 7             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627935)       | 07/19/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |

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|---------------|---|--------------|--|-------------------|
| 8             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627936) | 10/04/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 9             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627937)       | 10/04/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 10            | Annual Electric Fire Pump Report 2023 (00627938)                            | 03/28/2023   | The document reports annual inspection, testing and maintenance data; including fire pump performance results.                           | 18                |
| 11            | Semi-Annual Fire Alarm Inspection Report 2023 (00627939)                    | 07/19/2023   | The document reports results from the semi-annual fire alarm annual inspection and provides other details regarding testing data.        | 2                 |
| 12            | Annual Fire Alarm Inspection Report 2023 (00627940)                         | 03/03/2023   | The document reports results from the fire alarm annual inspection and provides other details regarding testing data.                    | 4                 |

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| <b>Unit 19 – Calistoga</b> |   |              |  |                   |
| 1                          | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627945) | 02/25/2023   | The document reports results of the first 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 (00627946)       | 02/25/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 3                          | Pre-Action Fire sprinkler System Quarterly and Annual Report (00627947)     | 02/25/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 6                 |
| 4                          | Standpipe and Hose System Quarterly and Annual Report (00627948)            | 02/25/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.  | 5                 |
| 5                          | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627949) | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |

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|---------------|---|--------------|--|-------------------|
| 6             | Dry Pipe Fire Sprinkler System Quarterly and Annual Report (00627950)       | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 7             | Main Drain Test Continuation Form (00627951)                                | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 1                 |
| 8             | Pre-Action Fire sprinkler System Quarterly and Annual Report (00627952)     | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 9             | Private Fire Service Main Quarterly and Annual Report (00627953)            | 04/04/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 2                 |
| 10            | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627954) | 07/19/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |



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|---------------|---|--------------|--|-------------------|
| 11            | Dry Pipe Fire Sprinkler System Quarterly and Annual Report (00627955)       | 07/19/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 12            | Pre-Action Fire sprinkler System Quarterly and Annual Report (00627956)     | 07/19/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 13            | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627957) | 10/05/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 14            | Dry Pipe Fire Sprinkler System Quarterly and Annual Report (00627958)       | 10/05/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 15            | Pre-Action Fire sprinkler System Quarterly and Annual Report (00627959)     | 10/05/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |

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|------------------------|---|--------------|---|-------------------|
| 16                     | Semi-Annual Fire Alarm Inspection Report 2023 (00627960)                    | 07/19/2023   | The document reports results from the semi-annual fire alarm annual inspection and provides other details regarding testing data.       | 2                 |
| 17                     | Annual Fire Alarm Inspection Report 2023 (00627961)                         | 02/25/2023   | The document reports results from the fire alarm annual inspection and provides other details regarding testing data.                   | 9                 |
| <b>Unit 20 – Grant</b> |   |              |   |                   |
| 1                      | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00630119) | 02/23/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 6                 |
| 2                      | Standpipe and Hose System Quarterly and Annual Report (00630120)            | 02/23/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 7                 |
| 3                      | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00630121)       | 02/23/2023   | The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |

| <b>Doc. #</b> | <b>Title</b>  | <b>Date*</b> | <b>Description</b>   | <b># of Pages</b> |
|---------------|---|--------------|--|-------------------|
| 4             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00630128) | 04/05/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |
| 5             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00630131)       | 04/05/2023   | The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS. | 3                 |
| 6             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00630134) | 07/19/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 4                 |
| 7             | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00630135)       | 07/19/2023   | The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.  | 3                 |
| 8             | Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00627981) | 10/04/2023   | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 4                 |

| Doc. #   | Title   | Date*      | Description  | # of Pages |
|--|---|------------|--|------------|
| 9  | Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00627982) | 10/04/2023 | The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS. | 3          |
| 10   | Annual Electric Fire Pump Report 2023 (00628448)                      | 03/28/2023 | The document reports annual inspection, testing and maintenance data; including fire pump performance results.                           | 18         |
| 11   | Semi-Annual Fire Alarm Inspection Report 2023 (00627984)              | 07/19/2023 | The document reports results from the semi-annual fire alarm annual inspection and provides other details regarding testing data.        | 2          |
| 12   | Annual Fire Alarm Inspection Report 2023 (00628423)                   | 02/23/2023 | The document reports results from the fire alarm annual inspection and provides other details regarding testing data.                    | 4          |
| * 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,

/s/

Chase K. Maxwell

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