

DOCKETED	
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Project Title:	Compass Energy Storage Project
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Document Title:	Application for Confidential Designation
Description:	N/A
Filer:	Erin Phillips
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July 24, 2024

VIA DOCKET UNIT E-FILING SYSTEM

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Compass Energy Storage Project Application for Confidential Designation

To whom it may concern:

Compass Energy Storage LLC, as applicant for the Compass Battery Energy Storage Project ("Project"), requests that the attached information be designated as confidential pursuant to 20 California Code of Regulations ("CCR") Section 2505. This information is being supplied to the California Energy Commission ("CEC") in the Updated Appendix listed below in support of the Applicant's opt-in application for the Project, which was docketed on March 29, 2024.

To support the Application for Confidential Designation, the following information has been provided and is consistent with the information requested in the Application for Confidential Designation (20 CCR § 2505 et seq.)

Applicant: Compass Energy Storage LLC

Address: 1360 Post Oak Blvd., Ste. 400, Houston, TX 77056

1(a). Title, date and description (including number of pages) of the record for which you request confidential designation.

Compass Energy Storage LLC Opt-In Application:

- Updated Appendix 1B, Property Owner and Site Information, July 2024, all pages

1(b). Specify the part(s) of the record for which you request confidential designation.

The documents referenced in 1(a) in their entirety.

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2. State and justify the length of time the Commission should keep the record confidential.

All documents associated with Updated Appendix 1B should be kept confidential indefinitely. This length of time is needed to ensure the perpetual protection of personal information under various provisions of the California Public Records Act (“PRA”) (Gov. Code, § 7920.000 et seq.).¹ If such names and addresses are released to the public domain, there is the potential for fraudulent use or abuse of such personal information.

3(a). State the provisions of the Public Records Act or other law that allows the Commission to keep the record confidential, and explain why the provision(s) apply to the record.

Names and addresses are considered “personal information” under the PRA. Personal information is protected from disclosure by various provisions of the PRA, including, but not limited to, Sections 7927.105(a)(1), 7927.400, 7927.405, 7927.410, 7927.425(b).

3(b). Discuss the public interest in nondisclosure of the record. If the record contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please also state how it would be lost, the value of the information to the applicant, and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

It is in the public interest to have nondisclosure of the Updated Appendix 1B to ensure that 20 CCR § 2505 is lawfully upheld.

It is also in the public interest to protect the information in Updated Appendix 1B from public disclosure to ensure the protection of personal information, preventing the potential abuse of such information. Disclosure would also violate the privacy rights of those not otherwise involved in the Project.

4. State whether the record may be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

The information disclosed in the confidential Updated Appendix 1B cannot be disclosed even if aggregated or masked due to its personal nature. The location of the Project has been disclosed in the Opt-In Application and thus the surrounding area will be reasonably ascertainable to the extent such information will assist CEC staff when performing their review

¹ Unless otherwise specified, all future uncited references are to the Government Code.

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and analysis. But the specific information contained in Updated Appendix 1B regarding owner names and addresses and site addresses must remain confidential to protect the privacy rights of those parties.

5. State how the record is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

The information contained within the confidential Updated Appendix 1B has not been disclosed to a person other than an employee, attorney, or consultant working on behalf of Compass Energy Storage LLC and under confidentiality agreements.

If you have any questions about the Compass Energy Storage Project's Application for Confidential Designation, please do not hesitate to contact Renée Robin, J.D., Director of Planning & Permitting, rene.robin@engie.com.

Pursuant to 20 CCR § 2505, as an officer authorized to make this application on behalf of Compass Energy Storage LLC, I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge.

Sincerely,

DocuSigned by:



Justin Amirault

Chief Development Officer

Engie North America

Flexible Generation

Justin.amirault@engie.com