

DOCKETED

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Project Title:	Compliance - Application for Certification of PG&E Geysers Unit 18
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Document Title:	GPC Unit 18_Q3 2024 ITM Corrective Action Compliance Submission_Repeated Application for Confidential Designation
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October 25, 2024

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

RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Summary of Corrective Actions Associated with the Findings Reported in the Fire Protection Systems Inspection, Testing, and Maintenance Records (Third Quarter of 2024) at the following:

**Geysers Unit 3, Sonoma (80-AFC-1C)
Geysers Unit 17, Lake View (79-AFC-1C)
Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-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 corrective action tables associated with the fire protection system (“FPS”) inspection, testing, and maintenance (“ITM”) reports covering the third quarter (“Q3”) of 2024, hereinafter “Repeated Application.” The FPS corrective action tables comply with 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 Q3 2024 ITM reports for the above-listed projects.

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 accompanying these ITM reports, for two years from the date of the reports. This Repeated Application is being submitted because the letter providing the corrective action tables for items identified for

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.

correction or repair in the Q3 2024 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.

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

Doc. #	Title	Date	Description	# of Pages
1	<p>Letter to John Heiser from Chase K. Maxwell on behalf of GPC; RE: Fire Protection-4 and Fire Protection-5</p> <p>– Submittal of Corrective Actions for Items Identified for Repair or Correction from the Inspection, Testing and Maintenance Reports for the Third Quarter of 2024 for 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)</p>	10/25/2024	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 or repair in the Q3 2024 ITM reports for three GPC plants, and it provides details for the corrective actions taken or to be taken.	6
2	<p>Letter to Keith Winstead from Chase K. Maxwell on behalf of GPC; RE: Geysers Unit 18, Socrates (79-AFC-03C): Fire Protection-4 – Corrective Actions for Items Identified for Repair or Correction from the Inspection, Testing and Maintenance Reports for the Third Quarter of 2024</p>	10/25/2024	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 or repair in the Q3 2024 ITM reports for Unit 18, Socrates, and it provides details for the corrective actions taken or to be taken.	2

