

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-OPT-01
<b>Project Title:</b>	Perkins Renewable Energy Project
<b>TN #:</b>	262535
<b>Document Title:</b>	Request for Confidentiality Perkins Phase I and Phase II Studies
<b>Description:</b>	Request for Confidentiality Perkins Phase I and Phase II Studies
<b>Filer:</b>	Emily Capello
<b>Organization:</b>	Panorama Environmental, Inc.
<b>Submitter Role:</b>	Applicant Consultant
<b>Submission Date:</b>	3/31/2025 10:40:15 AM
<b>Docketed Date:</b>	4/1/2025



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California Energy Commission  
1516 Ninth Street  
Sacramento, California 95814

**RE: Docket No. 24-OPT-01 – Perkins Clean Energy Project Opt-In Application  
Application for Confidential Designation – Data Request Response DR TSD-3 and DR TSD-4**

**Subject:** Application for Confidential Designation – Data Request Response to DR TSD-3 and DR TSD-4

To whom it may concern:

IP Perkins, LLC and Affiliates (“**IP Perkins**”) c/o Intersect Power, LLC as applicant for the Perkins Clean Energy Project (formerly referred to as “Umbriel” or the “Umbriel Clean Energy 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 response to Attachment B, Data Requests received from the CEC on March 28, 2024, for the opt-in application for the Perkins Renewable Energy Project.

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 (Title 20 Cal. Code. Regs., § 2505 Et Seq.) Revised 4/2023.

**1. Contact Information (20 CCR 1208.1.)**

**Applicant Name:** IP Perkins, LLC and Affiliates c/o Intersect Power, LLC  
**Address:** 9450 SW Gemini Drive, PMB #68743 Beaverton, Oregon 97008-7105  
**Proceeding Name:** Perkins Clean Energy Project  
**Docket Number:** 24-OPT-01

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

The following sections and attachments from the California Independent System Operator Phase I Interconnection Study for the Perkins Clean Energy Project dated September 15, 2022:

- Phase I - Queue Cluster 14 Phase I Interconnection Study Report, SDG&E Study Area Report - 128 pages
- Phase I - Appendix A - Q2166 - 20 pages
- Phase I - Appendix B CAISO Controlled Grid Generation Queue and SDG&E WDAT Generation Queue - 10 pages
- Phase I - Appendix C Load and Resource, 29 pages
- Phase I - Appendix D Steady-State Power Flow Results: Thermal and Voltage, 18 pages
- Phase I - Appendix E Power Flow Contingency List, 85 pages
- Phase I - Appendix F Short Circuit Results, 5 pages
- Phase I - Appendix G Charging Power Flow Results, 2 pages
- Phase I - Appendix H Deliverability Assessment Overloads, 23 pages



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The following sections and attachments from the California Independent System Operator Phase II Interconnection Study for the Perkins Clean Energy Project dated January 30, 2024:

- Phase II - Queue Cluster 14 Phase II Interconnection Study Report, SDG&E Study Area Report - 122 pages
- Phase II - Appendix A - Q2166 - 26 pages
- Phase II - Appendix B System Assumptions - 32 pages
- Phase II - Appendix C Contingency Lists, 162 pages
- Phase II - Appendix D Transient Stability Plots - 268 pages
- Phase II - Appendix E Reliability Assessment Results, 14 pages
- Phase II - Appendix H Short Circuit Study Results, 3 pages
- Phase II - Appendix I Deliverability Assessment Results, 13 pages
- Phase II - Appendix J Charging Power Flow Results, 2 pages

**3. Specify the part(s) of the record for which you request confidential designation. (If the data is in charts or spreadsheets, highlighting is sufficient.) (20 CCR 2505(a)(1)(B.))**

The documents referenced in response 2 in their entirety.

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

It is requested that all documents referenced in response 2 associated with the California Independent System Operator Phase I and Phase II Interconnection Studies be kept confidential indefinitely unless approved for public release by the California Independent System Operator ("CAISO"). Request for confidentiality is justified due to the fact that CAISO has designated the documents referenced in response 2 as confidential and because of the NDA by and between IP Perkins and CAISO related to the documents referenced in response 2.

**5. 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. (See Gov. Code, §§ 7920.000-7930.215.) (20 CCR (a)(1)(D.))**

*Under "Cal. Code Regs. Tit. 20, § 2505 - Designation of Confidential Records" (b) states: "When another federal, state, regional, or local agency or state-created private entity, such as the California Independent System Operator, possesses information pertinent to the responsibilities of the Commission that has been designated by the agency as confidential under the Public Records Act, or the Freedom of Information Act, the Commission, the Executive Director, or the Chief Counsel may request, and the agency shall submit the information to the Commission without an application for confidential designation. The Commission shall designate this information confidential."*

CAISO has designated all of the documents referenced in response 2 as confidential. Specifically, , it was acknowledged by and between CAISO and IP Perkins during a meeting on November 2,



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2022, that the documents referenced in response 2 shall be treated as confidential pursuant to pursuant to an Appendix DD, Generator Interconnection and Deliverability Allocation Procedures document, dated August 2, 2023, as provided by CAISO to IP Perkins (the “**GIDAP Appendix DD**”) and/or any related NDAs between CAISO and IP Perkins.

Pursuant to a Non-Disclosure Agreement by and between Intersect Power, LLC and CAISO, dated February 28, 2017 (the “**NDA**”), and as further acknowledged by and between CAISO and IP Perkins during a meeting on November 2, 2022, all documents referenced in response 2 shall be treated as confidential.

Pursuant to the GIDAP Appendix DD and the NDA, and in alignment with Cal. Code Regs. Tit. 20, § 2505, all of the documents referenced in response 2 in their entirety shall be kept confidential.

- 6. 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. (20 CCR (a)(1)(D.)).**

It is in the public interest to have nondisclosure of the documents referenced in response 2 to ensure that Cal. Code Regs. Tit. 20, § 2505 is lawfully upheld and that information CAISO has deemed confidential is treated as such.

Additionally, it is in the public interest to have nondisclosure of the documents referenced in response 2 to ensure industry competitiveness and trade secrets are maintained, therefore maintaining the competitiveness of the CAISO power market and keeping consumer energy prices at competitive levels.

CAISO’s estimates for the Network Upgrades and Interconnection Facilities completion timing and costs associated with upgrades applicable to the Project are confidential between CAISO and the Interconnection Customer, constituting a trade secret due to the private and confidential nature of agreement(s) between the two parties. These estimated costs and completion timing directly impact IP Perkins’ forecasted economic standing and could be detrimental for the Project if external competitors were able to gain this information. Public disclosure of this information would negatively impact IP Perkins’ competitive ability to negotiate with third parties on an ongoing basis given the confidential pricing and timing that has been secured and reflected in our estimates and forecasts. Industry competitors would be able to utilize this information to further their own negotiations with third parties with our data as leverage, enhancing their competitiveness and therefore negatively impacting IP Perkins.

- 7. 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).**



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**State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why. (20 CCR 2505(a)(1)(E.))**

The information in the document cannot be disclosed even if aggregated or masked due to the confidential designation imposed by CAISO under the GIDAP Appendix DD and the NDA.

**8. 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. (20 CCR 2505(a)(1)(F.))**

The information contained within the document referenced in response 2 has not been disclosed to a person other than an employee or contractor(s) working on behalf of IP Perkins and under non-disclosure agreements.

**Certification**

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 and I am authorized to make the application and certification on behalf of the applicant.

IP Perkins, LLC

A handwritten signature in blue ink, appearing to read "SR", written over a horizontal line.

By: Simon Ross, Chief Commercial Officer  
August 12, 2024