

**DOCKETED**

<b>Docket Number:</b>	79-AFC-01C
<b>Project Title:</b>	Compliance - Application for Certification for PG&E Geysers Unit 17 (78-NOI-3)
<b>TN #:</b>	262625
<b>Document Title:</b>	Repeated Application for Confidential Designation
<b>Description:</b>	N/A
<b>Filer:</b>	Chase Maxwell
<b>Organization:</b>	Climate Edge Law Group
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	4/8/2025 4:21:43 PM
<b>Docketed Date:</b>	4/8/2025



April 8, 2025

**E-Filed**

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

**RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the 2024 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 2024 fire protection system (“FPS”) inspection, testing, and maintenance (“ITM”) reports, hereinafter “Repeated Application.” The 2024 ITM reports for the above-listed projects are submitted in compliance with Condition of Certification FIRE PROTECTION-3.<sup>1</sup>

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>2</sup> This Repeated Application similarly seeks confidential designation for the ITM reports associated with FPS inspections

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<sup>1</sup> Condition of Certification Fire Protection-3 is applicable to the six GPC Commission certified projects pursuant to the Order Approving Settlement (ORDER NO: 20-1116-2) and associated materials adopted at the November 16, 2020 Commission meeting.

<sup>2</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.

conducted in 2024 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 designation remain unchanged.

Specifically, GPC requests confidential designation for the records listed in the table below. All documents in the foregoing table are being submitted to Commission staff via a Kiteworks secure file transfer system link provided by Commission staff for the upload of these documents.

	Title	Date*	Description	# of Pages
<b>Unit 3 – Sonoma</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q1 and annual)	01/18/2024	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 (Q1)	01/18/2024	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 (Q1 and annual)	01/18/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3
4	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q1 and annual)	01/18/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3
5	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q2)	04/02/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	4
6	Main Drain Test Continuation Form (Q2)	04/02/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	1



7	Pre-Action Fire Sprinkler System Quarterly and Annual Report (Q2)	04/02/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	3
8	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q2)	04/02/2024	The document reports results of the second 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 (Q3)	07/11/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
10	Main Drain Test Continuation Form (Q3)	07/11/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	1



11	Pre-Action Fire sprinkler System Quarterly and Annual Report (Q3)	07/11/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	3
12	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q3)	07/11/2024	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 (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
14	Main Drain Test Continuation Form (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	1



15	Pre-Action Fire Sprinkler System Quarterly and Annual Report (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
16	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
17	Private Fire Service Main Quarterly and Annual Report	07/11/2024	The document reports results of the annual inspection and provides other details regarding features of the FPS.	2
18	Standpipe and Hose System Quarterly and Annual Report	01/18/2024	The document reports results of the annual inspection and provides other details regarding features of the FPS.	3

19	Diesel Fire Pump Annual Report	07/11/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	15
20	Electric Fire Pump Annual Report	7/11/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
21	Fire Alarm Semi-Annual Inspection Report	07/11/2024	The document reports results from the semi-annual fire alarm inspection and provides other details regarding testing data and the FPS.	2
22	Fire Alarm – Annual Inspection Report	01/18/2024	The document reports results from the fire alarm annual inspection and provides other details regarding testing data and the FPS.	9



Unit 16 – Quicksilver				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q1 and annual)	01/19/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q1 and annual)	01/09/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3
3	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q2)	04/01/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	4
4	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q2)	04/01/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	3



5	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q3)	07/16/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
6	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q3)	07/16/2024	The document reports results of the third 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 (Q4)	10/25/2024	The document reports results of the fourth 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 (Q4)	10/25/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3



9	Electric Fire Pump Annual Report 2024 (Fire Pump 1)	07/16/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
10	Electric Fire Pump Annual Report 2024 (Fire Pump 2)	07/16/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
11	Electric Fire Pump Annual Report 2024 (Fire Pump 3)	07/16/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
12	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 1)	12/16/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6

13	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 2)	12/16/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6
14	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 3)	12/16/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6
15	Standpipe and Hose System Quarterly and Annual Report (annual)	01/19/2024	The document reports results of the annual inspection and provides other details regarding the features of the FPS.	3
16	Fire Alarm Semi-Annual Inspection Report 2024	07/16/2024	The document reports results from the semi-annual fire alarm inspection and provides other details regarding testing data and the FPS.	2

17	Fire Alarm Annual Inspection Report 2024	01/19/2024	The document reports results from the fire alarm annual inspection and provides other details regarding testing data and the FPS.	4
<b>Unit 17 – Lake View</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q1 and annual)	01/20/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	5
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q1 and annual)	01/20/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3
3	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q2)	04/03/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	4

4	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q2)	04/03/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	3
5	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q3)	07/17/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
6	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q3)	07/17/2024	The document reports results of the third 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 (Q4)	10/22/2024	The document reports results of the fourth 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 (Q4)	10/22/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
9	Standpipe and Hose System Quarterly and Annual Report	01/20/2024	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
10	Electric Fire Pump Annual Report 2024 (Fire Pump 1)	07/17/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
11	Electric Fire Pump Annual Report 2024 (Fire Pump 2)	07/17/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13



12	Electric Fire Pump Annual Report 2024 (Fire Pump 3)	07/17/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
13	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 1)	12/17/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6
14	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 2)	12/17/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6
15	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 3)	12/17/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6





16	Fire Alarm Semi-Annual Inspection Report 2024	07/17/2024	The document reports results from the semi-annual fire alarm inspection and provides other details regarding testing data and the FPS.	2
17	Fire Alarm Annual Inspection Report 2024	01/20/2024	The document reports results from the fire alarm annual inspection and provides other details regarding testing data and the FPS.	4
<b>Unit 18 – Socrates</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q1 and annual)	01/22/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q1 and annual)	01/22/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3

3	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q2)	04/01/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	4
4	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q2)	04/01/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	3
5	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q3)	07/12/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
6	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q3)	07/12/2024	The document reports results of the third 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 (Q4)	10/24/2024	The document reports results of the fourth 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 (Q4)	10/24/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
9	Standpipe and Hose System Quarterly and Annual Report	01/22/2024	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
10	Electric Fire Pump Annual Report 2024 (Fire Pump 1)	07/12/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13



11	Electric Fire Pump Annual Report 2024 (Fire Pump 2)	07/12/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
12	Electric Fire Pump Annual Report 2024 (Fire Pump 3)	07/12/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
13	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 1)	12/16/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6
14	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 2)	12/16/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6



15	[Updated] Electric Fire Pump Annual Report 2024 (Fire Pump 3)	12/16/2024	The document reports updated annual inspection, testing and maintenance data; including fire pump performance results.	6
16	Fire Alarm Semi-Annual Inspection Report 2024	07/12/2024	The document reports results from the semi-annual fire alarm inspection and provides other details regarding testing data and the FPS.	2
17	Fire Alarm Annual Inspection Report 2024	01/22/2024	The document reports results from the fire alarm annual inspection and provides other details regarding testing data and the FPS.	4
<b>Unit 19 – Calistoga</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q1 and annual)	01/17/2024	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 (Q1)	01/17/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	1
3	Dry Pipe Fire Sprinkler System Quarterly and Annual Report (Q1)	01/17/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3
4	Pre-Action Fire Sprinkler System Quarterly and Annual Report (Q1 and annual)	01/17/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3
5	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q2)	04/04/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	5

6	Main Drain Test Continuation Form (Q2)	04/04/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	1
7	Dry Pipe Fire Sprinkler System Quarterly and Annual Report (Q2)	04/04/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	4
8	Pre-Action Fire Sprinkler System Quarterly and Annual Report (Q2)	04/04/2024	The document reports results of the second 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 (Q3)	07/12/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4



10	Main Drain Test Continuation Form (Q3)	07/12/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	1
11	Dry Pipe Fire Sprinkler System Quarterly and Annual Report (Q3)	07/12/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
12	Pre-Action Fire Sprinkler System Quarterly and Annual Report (Q3)	07/12/2024	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 (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4





14	Main Drain Test Continuation Form (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	1
15	Dry Pipe Fire Sprinkler System Quarterly and Annual Report (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
16	Pre-Action Fire Sprinkler System Quarterly and Annual Report (Q4)	10/21/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
17	Standpipe and Hose System Quarterly and Annual Report	01/17/2024	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3



18	Fire Alarm Semi-Annual Inspection Report 2024	07/12/2024	The document reports results from the semi-annual fire alarm inspection and provides other details regarding testing data and the FPS.	2
19	Fire Alarm Annual Inspection Report 2024	01/17/2024	The document reports results from the fire alarm annual inspection and provides other details regarding testing data and the FPS.	9
<b>Unit 20 – Grant</b>				
1	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q1 and annual)	01/22/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	4
2	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q1 and annual)	01/22/2024	The document reports results of the first quarter inspection and provides other details regarding the location and features of the FPS.	3

3	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q2)	04/02/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	4
4	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q2)	04/02/2024	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	3
5	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (Q3)	07/12/2024	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
6	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (Q3)	07/12/2024	The document reports results of the third 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 (Q4)	10/26/2024	The document reports results of the fourth 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 (Q4)	10/26/2024	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
9	Standpipe and Hose System Quarterly and Annual Report	01/22/2024	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
10	Electric Fire Pump Annual Report 2024 (Fire Pump 1)	07/12/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13

11	Electric Fire Pump Annual Report 2024 (Fire Pump 2)	07/12/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
12	Electric Fire Pump Annual Report 2024 (Fire Pump 3)	07/12/2024	The document reports annual inspection, testing and maintenance data; including fire pump performance results.	13
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17	Fire Alarm Annual Inspection Report 2024	01/22/2024	The document reports results from the fire alarm annual inspection and provides other details regarding testing data and the FPS.	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: [chase@celawgroup.com](mailto:chase@celawgroup.com)