

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-OPT-02
<b>Project Title:</b>	Darden Clean Energy Project
<b>TN #:</b>	262867
<b>Document Title:</b>	FCFPD Request for Confidentiality Application
<b>Description:</b>	Required questions with answers from Fresno County Fire Protection District
<b>Filer:</b>	Joseph Andrew Cosentino
<b>Organization:</b>	Fresno County Fire Protection District
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	4/29/2025 7:46:23 PM
<b>Docketed Date:</b>	4/30/2025

To: Drew Bohan, Executive Director California Energy Commission

Subject: Application for Confidential Designation for the FCFPD Methodology for Calculating Monetary Costs to Provide Emergency Services

Docket Number 23-OPT-02 Darden Clean Energy Project

Mr. Bohan:

The Fresno County Fire Prevention District (FCFPD) 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 a request from Elizabeth Huber, Director of the Siting and Environmental Branch, CEC, made to us during a video conference on April 21, 2025 that included Dr. Alvin Greenberg, CEC staff for Fire Protection.

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.

Applicant: FCFPD  
Address: 210 S. Academy Avenue  
Sanger, CA 93657

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

Title: Methodology Used to Determine Solar/BESS Formula  
Date: 4/29/2025  
Number of Pages: 20

2. Specify the part(s) of the record for which you request confidential designation:  
The entirety.

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

This methodology should be kept confidential in perpetuity or until it has been made public by the FCFPD.

4. 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 that material.

This methodology serves to document how the FCFPD calculates the monetary value for fire, EMS, rescue, and HazMat services to be provided to new industrial energy sites in the county. It includes the Darden Project and other renewable energy project developers. The results of these calculations will apportion costs to provide our emergency services to each project as a result of both direct and cumulative impacts of each project and is consistent with the Fresno County General Plan adopted in 2024 that directs the FCFPD to provide emergency services to new developments without diminishing the services already provided to the community. This methodology was developed by and is wholly owned by the FCFPD and Fresno County such that the FCFPD is not authorized to share publicly.

5. 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.

The public interest will be served by nondisclosure by respecting ownership of intellectual property. Sharing such information without prior public disclosure by the owner(s) or pursuant to owner authorization would set an undesirable precedent for future use of methodology and impinge on the rights of the owner(s).

6. 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 FCFPD methodology relevant to the Darden Clean Energy Project has been referenced in section 4.4 of the Staff Assessment and explained in general. Energy Commission staff has reviewed the methodology and found it to be appropriate, useful, and based on sound principles. It cannot be aggregated or masked with other information for obvious reasons.

7. 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.

Detailed information about the methodology has been explained and discussed with two staff of the CEC on a video conference: Dr. Greenberg and Brett Fooks. Neither has received a copy of the methodology.

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.

Joseph A. Cosentino

A handwritten signature in black ink, reading "Joseph A. Cosentino". The signature is written in a cursive style with a large, stylized initial "J".

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Fresno County Fire Protection District