

DOCKETED	
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April 30, 2025

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 ("Compass"), 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") as an attachment to Compass' 4/30/25 Community Outreach Update for the Compass Energy Storage Project in support of the Applicant's opt-in application for the Project, which was docketed on March 29, 2024. Compass' Community Outreach Update letter has three attachments: A, B, and C. By this request, Compass is only seeking to keep Attachments A and C confidential in order to prevent stakeholder information and personal phone numbers and email address from being shared with the public. Attachment B is designed to be shared with the public.

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:

- Attachment A to Engie's 4/30/25 Community Outreach Update for the Compass Energy Storage Project: List of Organizations and Outreach Meetings, all pages

- Attachment C to Engie's 4/30/25 Community Outreach Update for the Compass Energy Storage Project: List of Support Petition Signatures with email addresses and phone numbers, 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.

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

Attachment A

The List of Organizations and Outreach Meetings listed in Attachment A should be kept confidential until Engie has satisfied the requirements of Public Resources Code section 25545.10. This length of time is needed to ensure the protection of deliberative processes, impressions, evaluations, and opinions of these organizations and stakeholders. If these organizations and meetings are released to the public domain, there is the potential for discouraging candid communication and undermining the organizations' ability to function effectively.

Attachment C

The phone numbers and email addresses in the List of Support Petition Signatures 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 numbers 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.

Attachment A

A record may be withheld where the public interest served by nondisclosure "clearly outweighs" the public interest served by disclosure. (Gov. Code, § 7922.000.) An organization's deliberative process allows for the free discussion of policies, strategies, and evaluations without fear of public scrutiny. Exposing these internal discussions could discourage candid

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

communication and undermine the organization's ability to function effectively. (See *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325.)

Attachment C

Numbers 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 documents referenced in 1(a) to ensure that 20 CCR § 2505 is lawfully upheld.

It is in the public interest to have nondisclosure of Attachment A to prevent a chilling effect on organizations' and other stakeholders' honest candor during decisionmaking.

It is also in the public interest to protect the phone numbers and addresses in Attachment C 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 development of 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 Attachments A and C 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 neighborhoods and interested communities and stakeholders will be reasonably ascertainable to the extent such information will assist CEC staff when performing their review and analysis.

In addition, the public-facing attachment to Compass' Community Outreach Update letter does contain names and zip codes of those persons otherwise identified in Attachment C. But the specific information contained in Attachment C regarding supporter phone numbers and email addresses must remain confidential to protect the privacy rights of those supporters.

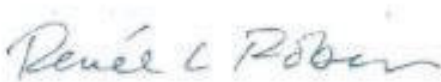
5. State how the record is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

The information contained within Attachments A and C 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, renee.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,



Renée L. Robin
Director of Planning and Permitting
Chief Development Officer
Engie North America
Renewable and Flex Power
Renee.robin@engie.com