

DOCKETED

Docket Number:	24-OPT-01
Project Title:	Perkins Renewable Energy Project
TN #:	262940
Document Title:	CEC Response to Perkin's Phase I & II Studies and Phase II Reassessment
Description:	N/A
Filer:	Marianna Brewer
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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May 02, 2025

Via Email

Emily Capello
Panorama Environmental, Inc.
17 Market Street, Suite 400
San Francisco, CA 94103
emily.capello@panoramaenv.com

**Application for Confidential Designation
Perkins Renewable Energy Project
Docket No. 24-OPT-01**

Dear Emily Capello:

The California Energy Commission (CEC) has received the IP Perkins, LLC and Affiliates c/o Intersect Power, LLC's (applicant) Applications for Confidentiality (TN 262535 and TN 262534), docketed April 1, 2025, covering the following documents:

- CAISO Phase I Interconnection Study, dated September 15, 2022:
 - Phase I - Queue Cluster 14 Phase I Interconnection Study Report, SDG&E Study Area Report
 - Phase I Appendix A - Q2166
 - Phase I - Appendix B CAISO Controlled Grid Generation Queue and SDG&E WDAT Generation Queue
 - Phase I - Appendix C Load and Resource
 - Phase I - Appendix D Steady-State Power Flow Results: Thermal and Voltage,
 - Phase I - Appendix E Power Flow Contingency List
 - Phase I - Appendix F Short Circuit Results
 - Phase I - Appendix G Charging Power Flow Results
 - Phase I - Appendix H Deliverability Assessment Overloads
- CAISO Phase II Interconnection Study, dated January 30, 2024:
 - Phase II - Queue Cluster 14 Phase II Interconnection Study Report, SDG&E Study Area Report
 - Phase II - Appendix A - Q2166
 - Phase II - Appendix B System Assumptions
 - Phase II - Appendix C Contingency Lists
 - Phase II - Appendix D Transient Stability Plots
 - Phase II - Appendix E Reliability Assessment Results
 - Phase II - Appendix H Short Circuit Study Results
 - Phase II - Appendix I Deliverability Assessment Results
 - Phase II - Appendix J Charging Power Flow Results

- CAISO 2024 Generator Interconnection Reassessment Report - Q2166 dated December 12, 2024 (2024 Generator Interconnection Reassessment Report)

The applicant requests that the documents referenced above be kept confidential indefinitely, in their entirety, unless approved for public release by the California Independent System Operator (CAISO). The applicant states that the CAISO has designated the Phase I, Phase II, and 2024 Generator Interconnection Reassessment Report documents as confidential.

A properly filed application for confidentiality shall be granted under California Code of Regulations, title 20, section 2505(a)(3)(A), "if the applicant makes a reasonable claim that the Public Records Act or other provision of law authorizes the [California Energy] Commission to keep the record confidential."

The applicant claims it is in the public interest to have Phase I, Phase II, and 2024 Generator Interconnection Reassessment Report documents deemed confidential to ensure industry competitiveness and maintain trade secrets, maintaining the competitiveness of the CAISO power market, and keeping consumer energy prices at competitive levels. The applicant states the information in the documents cannot be disclosed even if aggregated or masked due to the confidential designation imposed by CAISO under the GIDAP Appendix DD and the NDA. (Cal. Code Regs., tit. 20, § 2505(a)(1)(D).) The applicant states that the information contained within the documents referenced above have not been disclosed to a person other than an employee or contractors working on behalf of the applicant and under NDAs.

The applicant has made a reasonable claim that the documents should be made confidential due to CAISO's confidential designation. (Cal. Code Regs., tit. 20, § 2505(b).)

Executive Director's Determination

The applicant has made a reasonable showing that the information contained in the Phase I, Phase II, and 2024 Generator Interconnection Reassessment Report documents should be maintained as confidential due to CAISO's designation.

Be advised that persons may petition to inspect or copy records that have been designated as confidential, the executive director may disclose, or release records previously designated as confidential in certain circumstances, and the CEC may hold a hearing to determine the confidentiality of its records on its own motion or on a motion by CEC staff. The procedures and criteria for disclosing or releasing, filing, reviewing, and acting upon such petitions or motions are set forth in the California Code of Regulations, title 20, sections 2506 through 2508.

Any related subsequent submittals can be deemed confidential, without the need for an application, by following the procedures set forth in California Code of Regulations, title 20, section 2505(a)(4).

Emily Capello
May 02, 2025
Page 3

If you have questions, please email confidentialityapplication@energy.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'Drew Bohan', written in a cursive style.

Drew Bohan
Executive Director