

DOCKETED	
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Project Title:	Compliance - Application for Certification of the Occidental Plant # 1
TN #:	245358
Document Title:	Repeated Application for Confidential Designation
Description:	REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for Comment Logs Responding to CEC Staff Comments on Basis of Design Narratives for the following plants: Sonoma Geothermal Project, Unit 3 (80-AFC-01C); and Calistoga Geothermal Project, Unit 19 (81-AFC-01C)
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Submitter Role:	Applicant Representative
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August 18, 2022

E-Filed

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

**RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for
Comment Logs Responding to CEC Staff Comments on Basis of Design Narratives
for the following plants: Sonoma Geothermal Project, Unit 3 (80-AFC-01C); and
Calistoga Geothermal Project, Unit 19 (81-AFC-01C)**

Dear Mr. Bohan:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, Geysers Power Company, LLC (“GPC”) hereby submits this Repeated Application for Confidential Designation for records discussing the Basis of Design Narratives (“BOD”) submitted for GPC’s Sonoma Geothermal Project, Unit 3, and Calistoga Geothermal Project, Unit 19, hereinafter “Repeated Application.”

The BODs each describe the fire protection and life safety systems designed to protect each of these geothermal projects. As part of the recommissioning of the fire protection systems at the GPC geothermal projects, GPC has provided CEC Staff with BODs for Staff review and comment. The revised BODs for Unit 3, submitted on August 3, 2022, and the revised BOD for Unit 19, submitted on August 5th, are responsive to comments from CEC Staff on earlier versions of these BODs. The records submitted today, and for which GPC seeks confidential designation with this Repeated Application, are comment logs that discuss the Staff’s earlier BOD comments and provide explanations of how GPC has addressed Staff comments in the most recently submitted revisions of the BODs for these three plants. These comment logs are being provided to assist staff in further review of the most recently submitted BODs for Unit 3 and Unit 19. These comment logs are therefore BOD records that provide details concerning the specific design and operation features of the fire protection systems at these three geothermal plants.

By your letter dated February 2, 2022, “the BOD records, which include detailed information about the design and operation of the fire protection and related systems now installed or being installed at Geysers Units 3, 16, 17, 18, 19, and 20 are granted confidential

designation for the life of the Geysers or until such time as they may be publicly released.”¹ In regard to BOD records of the existing and new fire protection systems, this letter also explains, “details concerning the specific design and operation of the fire protection and wet-down system contained in the BOD records could provide sufficient information for someone to interfere with its proper functioning.”²

The comment logs discussing GPC’s response to Staff comments on the BODs include detailed information about the design and operation of the fire protection and related systems. Thus, this Repeated Application similarly seeks confidential designation for the comment logs in their entirety, as they are part of the BOD records for Unit 3 and Unit 19, for the life of these geothermal projects. This Repeated Application is being submitted because the comment logs for the BOD Narratives for Unit 3 and Unit 19 contain information that is substantially similar to the previously submitted information that was granted confidential designation by your February 2, 2022 letter, and all facts and circumstances relevant to the confidentiality remain unchanged.

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
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Attorneys for Geysers Power Company, LLC

¹ TN# 241373: *CEC Response Letter Geysers #3 Confidential Application May 25, 2018, Nov 19 and Dec 10 20221, and Jan 10 and 27, 2022*, dated Feb. 2, 2022, at p. 10.

² *Id.* at p. 7.