DOCKETED	
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Project Title:	Sacramento Municipal Utility District SMUDGEO #1
TN #:	246158
Document Title:	220920_GPC Unit 3 BOD Narrative_Repeated Application for Confidential Designation
Description:	N/A
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Submitter Role:	Applicant Representative
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September 20, 2022

## E-Filed

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

## **RE:** REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the following:

- Basis of Design Narrative (Revision 2) for Sonoma Geothermal Project, Unit 3, dated September 19, 2022 (80-AFC-01C)
- Basis of Design Narrative (Revision 2) for Calistoga Geothermal Project, Unit 19, dated September 19, 2022 (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 Designations for the following Basis of Design ("BOD") Narratives describing the fire protection and life safety systems designed to protect GPC's Sonoma Geothermal Project, Unit 3, and GPC's Calistoga Geothermal Project, Unit 19, hereinafter "Repeated Application."

The BOD Narrative for Unit 3 is dated September 19, 2022, it is identified as Revision 2, and it is a revision of the August 1, 2022 BOD that was provided to the Commission on August 3, 2022. The BOD Narrative for Unit 19 is also dated September 19, 2022, it is also identified as Revision 2, and it is a revision of the August 4, 2022 BOD that was provided to the Commission on August 5, 2022. GPC's repeated applications for confidential designation for the August BOD Narrative submissions for Unit 3 and Unit 19 were approved with confidentiality granted in a single letter dated August 12, 2022. The Unit 3 BOD Narrative-Revision 2 and Unit 19 BOD Narrative-Revision 2 each replace the previously submitted BODs for these geothermal projects. These BOD Narratives are responsive to further comments received from Commission staff after the August 2022 versions of the BOD Narratives were submitted.

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

<sup>&</sup>lt;sup>1</sup> TN# 244824: CEC Response Letter to Geysers' Repeated Application for Confidentiality for Units 3, 17, & 19, dated August 12, 2022.

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." This Repeated Application similarly seeks confidential designation for the BOD Narrative for Unit 3 and the BOD Narrative for Unit 19 for the life of these geothermal projects. This Repeated Application is being submitted because the Basis of Design Narrative for Unit 3, dated September 19, 2022, and the Basis of Design Narrative for Unit 19, dated September 19, 2022, 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,

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Chase K. Maxwell

E-Mail: <u>ckm@eslawfirm.com</u>

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<sup>&</sup>lt;sup>2</sup> 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.