DOCKETED	
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Project Title:	Compliance - Application for Certification of the Occidential Plant # 1
TN #:	246378
Document Title:	Repeated Application for Confidential Designation for the Calistoga Geothermal Project, Unit 19 BOD & ReCx Rev 2
Description:	N/A
Filer:	Eric Janssen
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
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October 6, 2022

## <u>E-Filed</u>

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

## **RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the** Calistoga Geothermal Project, Unit 19 (81-AFC-01C), Basis of Design Narrative and Recommissioning Plan (Revision 2), dated October 3, 2022

Dear Mr. Bohan:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, Geysers Power Company ("GPC") hereby submits this Repeated Application for Confidential Designation for the Basis of Design Narrative and Recommissioning Plan ("BOD & ReCx") for the Calistoga Geothermal Project, Unit 19, dated October 3, 2022, hereinafter "Repeated Application." The BOD & ReCx describes the fire protection and life safety systems designed to protect GPC's Calistoga Geothermal Project, and it outlines the Recommissioning Plan developed to confirm and verify that the systems' performance meet GPC's requirements and basis of design.

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."<sup>1</sup> The BOD records are described as consisting of "[d]raft and final basis of design narratives and recommissioning plan drafts that contain detailed information regarding facility fire protection and wet-down systems."<sup>2</sup> This Repeated Application similarly seeks confidential designation for this second revision of the BOD & ReCx for Unit 19 for the life of the geothermal project. This Repeated Application is being submitted because this second revision of the BOD & ReCx for Unit 19, dated October 3, 2022, contains information that is substantially similar to the previously submitted information that was granted confidential designation by your February 2<sup>nd</sup>

<sup>&</sup>lt;sup>1</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.

<sup>&</sup>lt;sup>2</sup> *Id*. at p. 2.

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letter, and all facts and circumstances relevant to the confidentiality remain unchanged. Also, please note that GPC previously received approval for confidentiality of the first revision of the BOD & ReCx for Unit 19, which was submitted to the Commission on April 20, 2022.<sup>3</sup>

Additionally, on October 5, 2022, GPC submitted the second revision of the BOD & ReCx for Unit 19 directly to Commission staff via a Kiteworks secure file transfer link provided by Commission staff for document upload because of the large file size of the document. Accordingly, per instruction from the Commission's Docket Office, the confidential portion of this confidential e-filing includes a placeholder sheet standing in for the second revision of the BOD & ReCx for Unit 19.

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

<sup>&</sup>lt;sup>3</sup> TN# 242912: CEC Response Letter Regarding Application for Confidentiality (Geysers Unit 19 - BOD), dated May 2, 2022.