

DOCKETED

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Project Title:	Compliance - Application for Certification for PG&E Geysers Unit 16 (78-NOI-6)
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Document Title:	GPC Unit 16_Q3 2022 ITM Reports and Compliance Documents_Repeated Application for Confidential Designation
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November 4, 2022

E-Filed

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

RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Inspection, Testing, and Maintenance Records (Third Quarter of 2022) and Summary of Corrective Actions for the Fire Protection Systems at the following:

**Geysers Unit 3, Sonoma (80-AFC-1C)
Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lake View (79-AFC-1C)
Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C)
Geysers Unit 20, Grant (82-AFC-1C)**

Dear Mr. Bohan:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, Geysers Power Company, LLC (“GPC”), the project owner of the above-listed Commission certified projects, hereby submits this *Repeated Application for Confidential Designations* for the fire protection system (“FPS”) inspection, testing, and maintenance (“ITM”) reports for the third quarter of 2022, and the corresponding corrective action tables, hereinafter “Repeated Application.” The ITM reports for the above-listed projects are submitted in compliance with condition of certification Fire Protection-3. The corrective action tables comply with conditions of certification Fire Protection-4 and Fire Protection-5 by providing details for the actions GPC has taken or plans to take to address items identified for correction or repair in the ITM reports.

By your letter dated February 2, 2022, “the ITM records and summary of corrective actions setting forth the system status and schedule for system work will be subject to the same two-year confidentiality period from the date of the report.”¹ This Repeated Application similarly seeks confidential designation for the ITM reports associated with FPS inspections conducted for the second quarter of 2022, and the corrective action information accompanying

¹ TN# 241373: *CEC Response Letter Geysers #3 Confidential Application May 25, 2018, Nov 19 and Dec 10 2021, and Jan 10 and 27, 2022*, dated Feb. 2, 2022, at p. 10.

these ITM reports, for two years from the date of the reports. This Repeated Application is being submitted because the ITM reports for the third quarter of 2022 and the accompanying cover letter with corrective action tables contain information that is substantially similar to the previously submitted information that was granted confidential designation by your February 2nd letter. All facts and circumstances relevant to the confidentiality remain unchanged.

Specifically, GPC requests confidential designation for the records listed in the table below.

Doc. #	Title	Date	Description	# of Pages
1	Letter to John Heiser from Chase K. Maxwell on behalf of GPC; RE: Fire Protection- 3, Fire Protection-4, and Fire Protection-5 – Submittal of Inspection, Testing and Maintenance Reports for the Third Quarter of 2022 for Geysers Power Company LLC plants: Geysers Unit 3, Sonoma (80-AFC-01C); Geysers Unit 17, Lake View (79-AFC-01C); and Geysers Unit 19, Calistoga (81-AFC-01C)	11/4/2022	This letter provides confidential data required by Fire Protection conditions of certification applicable to all GPC plants. The letter includes descriptions of items identified for correction in the Q3 2022 ITM reports for three GPC plants and provides details for the corrective actions taken or to be taken.	6
2	Letter to Keith Winstead from Chase K. Maxwell on behalf of GPC; RE: Fire Protection- 3, Fire Protection-4, and Fire Protection-5 – Submittal of Inspection, Testing and Maintenance Reports for the Third Quarter of 2022 for the Geysers Power Company LLC plants: Geysers Unit 16, Quicksilver (79-AFC-05C); Geysers Unit 18, Socrates (79-AFC-03C); and Geysers Unit 20, Grant (82-AFC-01C)	11/4/2022	This letter provides confidential data required by Fire Protection conditions of certification applicable to all GPC plants. The letter includes descriptions of items identified for correction in the Q3 2022 ITM reports for three GPC plants and provides details for the corrective actions taken or to be taken.	4

Doc. #	Title	Date	Description	# of Pages
Unit 3 – Sonoma				
1	Fire Alarm and Life Safety System Inspection Certificate (00591101)	8/15/2022*	The document reports results of the semi-annual fire alarm and life safety system inspection and provides other details regarding the location and features of the FPS.	24
2	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (005911006)	8/4/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
3	Pre-Action Fire Sprinkler System Quarterly and Annual Report (00591107)	8/4/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	3
4	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00591108)	8/4/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	3

Doc. #	Title	Date	Description	# of Pages
Unit 16 – Quicksilver				
1	Fire Alarm and Life Safety System Inspection Certificate (00591124)	8/8/2022*	The document reports results of the semi-annual fire alarm and life safety system inspection and provides other details regarding the location and features of the FPS.	10
2	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00591125)	8/15/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
3	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00591126)	8/15/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	3
Unit 17 – Lake View				
1	Fire Alarm and Life Safety System Inspection Certificate (00591110)	8/11/2022*	The document reports results of the semi-annual fire alarm and life safety system inspection and provides other details regarding the location and features of the FPS.	12

Doc. #	Title	Date	Description	# of Pages
2	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00591113)	8/16/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
3	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00591115)	8/16/2022*	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	3
Unit 18 – Socrates				
1	Fire Alarm and Life Safety System Inspection Certificate (00591128)	8/11/2022*	The document reports results of the semi-annual fire alarm and life safety system inspection and provides other details regarding the location and features of the FPS.	10
2	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00591129)	8/15/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
3	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00591131)	8/15/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	3

Doc. #	Title	Date	Description	# of Pages
Unit 19 – Calistoga				
1	Fire Alarm and Life Safety System Inspection Certificate (00591117)	8/10/2022*	The document reports results of the semi-annual fire alarm and life safety system inspection and provides other details regarding the location and features of the FPS.	29
2	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00591120)	8/17/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	4
3	Dry Pipe Fire Sprinkler System Quarterly and Annual Report (00591119)	8/17/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	3
4	Pre-Action Fire Sprinkler System Quarterly and Annual Report (00591122)	8/17/2022*	The document reports results of the third quarter inspection and provides other details regarding the location and features of the FPS.	3

Doc. #	Title	Date	Description	# of Pages
Unit 20 – Grant				
1	Fire Alarm and Life Safety System Inspection Certificate (00591133)	8/12/2022*	The document reports results of the semi-annual fire alarm and life safety system inspection and provides other details regarding the location and features of the FPS.	12
2	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report for Calpine 10350 (Grant) Unit 20 (00591135)	8/15/2022*	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	4
3	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00591136)	8/15/2022*	The document reports results of the second quarter inspection and provides other details regarding the location and features of the FPS.	3
* The document dates reflect the date of the inspection provided in the reports and do not indicate the date that these reports were made available to GPC by the inspector.				

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: ckm@eslawfirm.com