

**DOCKETED**

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<b>Project Title:</b>	Compliance - Application for Certification of DWR Bottlerock Geothermal Project
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<b>Filer:</b>	John C Casteel
<b>Organization:</b>	Mayacma Geothermal LLC
<b>Submitter Role:</b>	Applicant
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March 26, 2026

Docket Unit  
California Energy Commission

APPLICATION FOR CONFIDENTIAL DESIGNATION  
(Title 20 Cal. Code. Regs., § 2505 et seq.)

**Applicant: Mayacma Geothermal**  
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**Proceeding Name: Bottle Rock Geothermal Power Plant**  
**Docket No.: 79-AFC-04C**

To the Docket Unit:

Pursuant to 20 CCR § 2505(a)(1), and on behalf of Bottle Rock Power, LLC and Open Mountain Energy, Mayacma Geothermal request confidential designation for **the First Amended and Restated Large Generator Interconnection Agreement (LGIA)** submitted in response to Data Request Set No. 6.

The 124-page interconnection agreement executed April 8, 2025, includes technical, operational, and financial terms for interconnecting the Bottle Rock Power Plant Repowering Project to the CAISO Controlled Grid via PG&E's transmission system.

We request that the CEC maintain the entirety of the LGIA including all exhibits and attachments as confidential for five (5) years from the date of the CEC's determination. This term is requested because the agreement reflects negotiated commercial terms, schedules, and project-specific technical requirements that remain sensitive during development, procurement, financing, and implementation.

The LGIA cannot be meaningfully disclosed through aggregation or masking without redacting substantial portions of the document because sensitive commercial and technical provisions are integrated throughout.

This request for confidential designation is made on the basis of CEC regulations on Designation of Confidential Records (20 Cal. Code Regs. § 2505(a)(1)(D) and (b)) and the California Public Records Act (Cal. Gov. Code §§ 7922.000, 7927.605(a), 7927.705). CAISO considers the LGIA to be confidential, providing the CEC authority under its regulations to designate the LGIA as confidential. (20 Cal. Code Regs. § 2505(b).) Given that CAISO considers the LGIA to contain market-sensitive, confidential information, the public interest is served by maintaining that confidentiality. Under the California Public Records Act, the CEC may withhold disclosure of a record where the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record. (Cal. Gov. Code § 7922.000.) The LGIA contains confidential information on the Mayacma Geothermal Project, including key commercial considerations such as the cost and timing of interconnection upgrades. California maintains a competitive power market within the CAISO area, where specific market participant data is strictly confidential. Disclosure of Mayacma Geothermal's confidential information to other energy project developers would provide those companies with a competitive advantage in the CAISO market. On the other hand, maintaining the confidentiality of this sensitive commercial information allows Mayacma Geothermal to remain on equal footing in the market. This competitive market, where all market participants are limited in their access to other participants' confidential commercial information, is designed to deliver the least-cost electricity to California ratepayers. Given



nature of the market, the public interest served by not disclosing the confidential information in the LGIA clearly outweighs any public interest served by disclosure, under California Government Code section 7922.000A.

In addition, the LGIA should be designated as confidential because it contains trade secrets and its disclosure would cause a loss of competitive advantage. (20 Cal. Code Regs. § 2505(a)(1)(D).) The California Public Records Act excludes from disclosure corporate proprietary information, including trade secrets, and information related to siting within California furnished to a government agency, like the CEC, for the purpose of permitting the agency to work with a company to locate or expand a facility within the state. (Cal. Gov. Code § 7927.605(a)). Records that contain trade secrets are also generally protected from disclosure under the California Public Records Act. (Cal. Gov. Code § 7927.705; Cal. Evid. Code §§ 1060, 1061(a)(1).) A trade secret is information, including a formula, pattern, compilation, program, device, method, technique, or process that derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use, and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. (Cal. Evid. Code § 1061(a)(1), Cal. Civil Code § 3426.1(d).) Mayacma Geothermal derives economic value from the information in the LGIA not being known to the public and competitors, who could obtain a competitive advantage from disclosure of such information. The LGIA contains trade secrets and commercially proprietary information provided to the CEC for purposes of siting the Mayacma Geothermal project, the disclosure of which would cause Mayacma Geothermal to lose competitive advantage in developing the project.

Please restrict access to the LGIA to personnel and representatives with a need to know, maintain it in controlled-access storage. The LGIA has been shared only as necessary with counterparties (PG&E and CAISO) and Applicants' consultants, counsel, and financing parties under confidentiality obligations.

**I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge.**

Regards,

A handwritten signature in black ink, appearing to read "Brady Olson", written in a cursive style.

Brady Olson  
Manager  
Mayacma Geothermal