

DOCKETED

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Project Title:	Compliance - Application for Certification of DWR Bottlerock Geothermal Project
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Filer:	John C Casteel
Organization:	Mayacma Geothermal LLC
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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

Phone Number: 801-885-1653

Email: Brady@openmountainenergy.com

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 **Repowering Study Report – Bottle Rock Power Plant (Q81) Repowering Project (FINAL)** submitted in response to Data Request Set No. 6.

The 19-page report dated December 2022 contains project-specific interconnection and transmission system studies, including study assumptions and results prepared for interconnection to the CAISO Controlled Grid via PG&E's transmission system. The report is marked "Confidential" by CAISO and includes non-public technical analyses and related supporting materials.

We request that the CEC maintain the entirety of the Repowering Report, including all figures, tables, and any exhibits or attachments, as confidential until the study is superseded, and the information is no longer commercially or operationally sensitive. This term is requested because the report reflects non-public study assumptions, system conditions, and technical findings that remain sensitive during development, procurement, and implementation and may implicate third-party controlled information associated with CAISO. As such, the Repowering Report cannot be meaningfully disclosed through aggregation or masking.

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 has designated the Repowering Report as confidential, providing the CEC authority under its regulations to designate the Repowering Report as confidential. (20 Cal. Code Regs. § 2505(b).) Given that CAISO has designated the Repowering Report as confidential due to the market-sensitive, confidential information it contains, 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 Repowering Report 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 the nature of the market, the public interest served by not disclosing the confidential information in the Repowering Report clearly outweighs any public interest served by disclosure, under California Government Code section 7922.000.

In addition, the Repowering Report 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 Repowering Report not being known to the public and competitors, who could obtain a competitive advantage from disclosure of such information. The Repowering Report 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 Repowering Report to personnel and representatives with a need to know and maintain it in controlled-access storage. The report has been shared only as necessary with counterparties 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