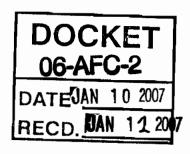
COMPLETED

GALATI & BLEK Counselors & Advocates

Plaza Towers 555 Capitol Mall Suite 600 Sacramento, CA 95814

January 10, 2007

Mr. B.B. Blevins Executive Director California Energy Commission 1516 Ninth Street Sacramento, CA 95814



Subject: Repeated Request for Confidential Designation Confidential Air Quality Status Report No. 2 Confidential Offset Strategy AES Highgrove Project (06-AFC-2)

Dear Mr. Blevins,

AES Highgrove, LLC (AES) is the owner of the AES Highgrove Project. AES requested Confidential Designation of a Confidential Offset Strategy in a previous filing dated June 27, 2006. Staff submitted Data Requests, which required AES to provide monthly status reports relating to implementation of its Confidential Offset Strategy. AES has previously filed Confidential Air Quality Status Report No. 1 and requests that the attached Confidential Air Quality Status Report No. 2 be designated confidential pursuant to 20 CCR Section 2505 (b). This information is substantially similar to the prior requests and the facts and circumstances that make the information contained in the Confidential Air Quality Status Report No. 2 confidential.

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 and that I am authorized to make the application and certification on behalf of the applicant.

Scott A. Galati Counsel for AES

