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COMPLETED

September 2, 2011

DOCKET	
11-CAI-02	
DATE	SEP 02 2011
RECD.	SEP 02 2011



Robert Oglesby
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: ORMAT Nevada, Inc. Application for Confidential Designation In Response to Staff Requests for Information Dated August 15, 2011 (11-CAI-02).

Dear Mr. Oglesby:

Pursuant to Title 20, California Code of Regulations sections 2501 *et seq.*, ORMAT Nevada, Inc. hereby submits this "Application for Confidential Designation", for certain information provided in ORMAT Nevada, Inc.'s response to the attached letters from Terrence O' Brien dated August 15, 2011 in proceeding number 11-CAI-02.

We are enclosing the Application for Confidential Designation and confidential materials directly to you without docketing at the Docket Unit. Enclosed are four copies plus an original of this request, and five copies of the confidential information. Please feel free to contact me at (916) 447-2166 should you have any questions or require additional information. Thank you for your consideration of our request.

Sincerely,

A handwritten signature in black ink, appearing to read "Samantha G. Pottenger".

Samantha G. Pottenger
Christopher T. Ellison
Attorneys for ORMAT Nevada, Inc.

enc.

APPLICATION FOR CONFIDENTIAL DESIGNATION
ORMAT Nevada, Inc. Responses to CEC Engineering Questionnaires
(11-CAI-02)

1. *Specifically indicate those parts of the record which should be kept confidential.*

The following information provided by ORMAT Nevada, Inc.'s ("ORMAT") in response to Mr. O' Brien's August 15, 2011 letters regarding North Brawley Geothermal Project Generating Capacity and East Brawley Geothermal Project Generating Capacity should be kept confidential:

- North Brawley Geothermal Power Plant Heat and Mass Balance Diagram;
- East Brawley Geothermal Power Plant Heat and Mass Balance Diagram;
- North Brawley Conceptual Geofluid Process Flow Diagrams;
- North Brawley CW Pump Information;
- ORMAT Hydraulic Analysis;
- ORMAT HEBER II Optimization Project Brushless Synchronous Generator Specifications;
- Cooling Tower Institute Specifications for Mechanical Draft Cooling Tower;
- Data Sheet Synchronous Machines;
- ORMAT Heat Exchanger Specification Sheets; and
- Power Purchase Agreement ("PPA") between ORNI 18, LLC and Southern California Edison.

2. *State the length of time the record should be kept confidential, and provide justification for the length of time.*

The technical data contained in the documents identified above must remain confidential for the operating life of the North Brawley Geothermal Development Project ("North Brawley") and East Brawley Geothermal Development Project ("East Brawley"). These documents provide information regarding project equipment layouts, project specific information, and commercially sensitive proprietary information regarding ORMAT's unique technology. Release of this information could disclose protected trade secret information.

3. *Cite and discuss (i) the provisions of the Public Records Act or other law which allow the commission to keep the record confidential and (ii) the public interest in nondisclosure of the record.*

The California Public Records Act exempts from public disclosure "trade secrets" which includes "any formula, plan, . . . production data, or compilation of information . . . , which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service . . . and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it." (Cal. Govt. Code § 6254.7(d)) Trade secrets are also protected under the Commission's regulations, which provide

that information may be designated as confidential if it “contains a trade secret or its disclosure would otherwise cause a loss of competitive advantage.” (Calif. Code of Regulations, Title 20, section 2505(a)(1)(D)). As stated above, the documents provided above provide detailed, project-specific information regarding the project layouts, proprietary generator information, and project design, information that is protected as ORMAT’s trade secrets. Such information provides valuable information to competitors regarding ORMAT’s proprietary generator design information or plant layout. Furthermore, disclosure of such information, for example North Brawley’s CW pump information, could cause a loss of competitive advantage to ORMAT in negotiations for project equipment, or if used by competitors to evaluate pricing. Therefore, the information identified above should be designated as confidential.

4. *State whether the information may be disclosed if it is aggregated with other information or masked to conceal certain portions, and if so the degree of aggregation or masking required.*

ORMAT considered whether it would be possible to aggregate or mask the information. However, no feasible method of aggregating or masking the information could be identified that would not either disclose the information or render the information provided useless.

5. *State whether and how the information is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant, and if so under what circumstances.*

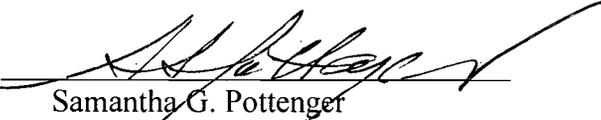
Beyond its response to Mr. O’Brien’s August 15, 2011 letters, ORMAT has not disclosed any of the subject information to anyone other than its employees, attorneys and consultants.

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 belief. I am authorized to make the Application and Certification on behalf of ORMAT Nevada, Inc.

Dated: September 2, 2011

ELLISON, SCHNEIDER & HARRIS LLP

By:


Samantha G. Pottenger
Christopher T. Ellison
Ellison, Schneider & Harris L.L.P.
Attorneys for ORMAT Nevada, Inc.