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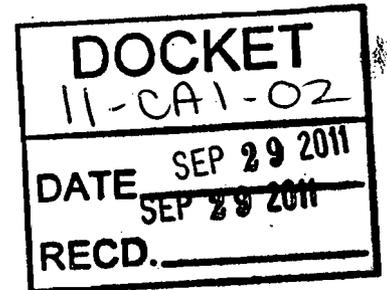
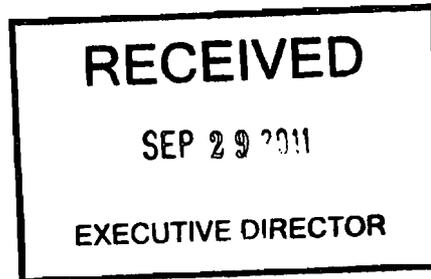
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September 29, 2011

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



RE: North Brawley Geothermal Project Generating Capacity and East Brawley Geothermal Project Generating Capacity – 11-CAI-02

Dear Mr. Oglesby:

Pursuant to Title 20, California Code of Regulations sections 2501 *et seq.*, ORMAT Nevada, Inc. (the "Respondent") hereby submits this "Application for Confidential Designation", for California Unions for Reliable Energy's Exhibit 52 in this proceeding.

We are enclosing the Application for Confidential Designation 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.**  
**(11-CAI-02)**

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

CURE's Exhibit 52 – CURE's Witness David Marcus Notes

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

The document 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") as the document contains confidential technical data related to project specific design information of North Brawley and East Brawley, 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 document listed above provides detailed, project-specific information regarding proprietary generator information and project design features of North Brawley and East Brawley, information that is protected as ORMAT's trade secrets. Such information provides valuable engineering and other detailed information to competitors regarding ORMAT's proprietary generator design information, such as component efficiency levels and load information. Therefore, the information identified above in Section 1 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.*

ORMAT has not disclosed any of the subject information to anyone other than its employees, attorneys and consultants, and to Counsel for Imperial County, CEC Staff and CURE pursuant to a nondisclosure agreement.

*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 29, 2011

ELLISON, SCHNEIDER & HARRIS L.L.P.

By: 

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