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COMPLETED

April 16, 2012

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

DOCKET 11-AFC-2	
DATE	APR 16 2012
RECD.	APR 16 2012

Re: Hidden Hills Solar Electric Generating System (11-AFC-2)
Application for Confidential Designation

Dear Mr. Oglesby:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, Hidden Hills Solar I, LLC and Hidden Hills Solar II, LLC (collectively "Applicant") hereby submits this "Application for Confidential Designation" for the Draft Construction Site Security Plan for Hidden Hills Electric Generating System, which is submitted as part of Applicant's Supplemental Data Responses, Set 3, Data Response SE-6. This information is being submitted on five CDs.

We are submitting the Application and confidential material directly to the Docket Unit. Please feel free to contact us at (916) 447-2166 should you have any questions or require additional information. Thank you for your consideration of Applicant's request.

Sincerely,



Samantha G. Pottenger
Jeffery D. Harris

Attorneys for Applicant

APPLICATION FOR CONFIDENTIAL DESIGNATION

Hidden Hills Solar Electric Generating System (11-AFC-2) Hidden Hills Solar I, LLC and Hidden Hills Solar II, LLC (the "Applicant")

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

Applicant requests that the Draft Construction Site Security Plan for the Hidden Hills Solar Electric Generating System project submitted as part of Supplemental Data Responses Set 3, Data Response SE-6 be kept confidential.

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

The Draft Construction Site Security Plan should be kept confidential from submittal through the decommissioning of the Project in order to protect the information identified therein.

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.*

Section 6255 of the California Government Code provides that an agency may exempt a record from public disclosure when the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure. The Draft Construction Site Security Plan is a non-public document that contains sensitive information relating to infrastructure security concerns specific to the methods and mechanisms that will be used to secure the Hidden Hills Solar Electric Generating System should the California Energy Commission certify the Project. The public interest in nondisclosure of the record is served by preventing access to infrastructure information by unauthorized persons who may pose a threat to the public safety, and who may attempt to use the infrastructure security information for illegitimate purposes. Ensuring public safety and maintaining the integrity of security plans for infrastructure such as the HHSEGS Project through nondisclosure of the Draft Construction Site Security Plan far outweighs the public interest in disclosure.

Therefore, Applicant is requesting confidential designation of the Draft Construction Site Security Plan as the document contains sensitive information relating to infrastructure security concerns that should not be released publicly.

APPLICATION FOR CONFIDENTIAL DESIGNATION
Hidden Hills Solar Electric Generating System (11-AFC-2)

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.*

Applicant considered whether it would be possible to aggregate or mask the information contained in the Draft Construction Site Security Plan. 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.

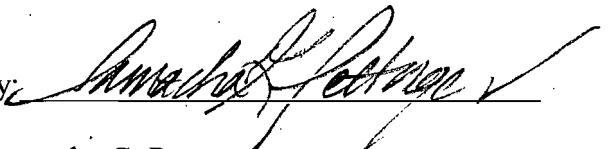
5. *State whether and how the information is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant, and if so under what circumstances.*

Applicant has not disclosed any of the subject information to anyone other than its employees, attorneys and consultants working on the Project. Moreover, this information has not been disclosed to persons employed by, or working for, Applicant except on a confidential, "need-to-know" basis.

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 this Application and Certification on behalf of the Applicant.

Dated: April 16, 2012

ELLISON, SCHNEIDER & HARRIS L.L.P.

By: 

Samantha G. Pottenger
Jeffery D. Harris
Ellison, Schneider & Harris L.L.P.

Attorneys for Applicant