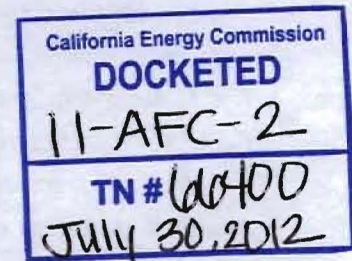


COMPLETED



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



July 23, 2012

RE: Hidden Hills Solar Electric Generating System – 11-AFC-2

Application for Confidential Designation: Historical Cultural Resources

Dear Mr. Oglesby:

Pursuant to Title 20, California Code of Regulations, Section 2501 et seq., Intervenor Old Spanish Trail Association (OSTA) hereby submits this "Application for Confidential Designation" for an appendix to our public comment on the CEC's Preliminary Staff Assessment for Cultural Resources. The PSA was posted on the CEC web site on June 15.

OSTA's public comment addresses non-site specific statutory measures providing for the protection of National Historic Trails. These are all matters of public law and administration. The Confidential appendix--which will be subject to the same confidentiality strictures as the CH2MHill report--addresses specific issues concerning the trail route in and near the HHSEGS site.

Enclosed is the Application for Confidential Designation and five copies of the confidential information. Please feel free to contact me at 310-895-4747 or by return e-mail should you have any questions or require additional information.

Sincerely,

Jack Prichett  
On behalf of Old Spanish Trail Association.

## APPLICATION FOR CONFIDENTIAL DESIGNATION

Hidden Hills Solar Electric Generating System – 11-AFC-2

Old Spanish Trail Association (the "Applicant" and "Intervenor")

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

*The Applicant/Intervenor, Old Spanish Trail Association (OSTA), requests confidential status for the attached Appendix to its public comments, which discuss the location for the mule trace of the Old Spanish Trail within the HHSEGS project site. OSTA's Appendix discusses the location information contained in the Bright Source's confidential report which OSTA has access to pursuant to a non-disclosure agreement. In addition, OSTA's comments provide some location information for the Old Spanish Trail developed by OSTA.*

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

*This information should be held confidential indefinitely to protect the historical resource.*

3. Cite and discuss the provisions of the Public Records Act or other law that allow the Commission to keep the record confidential and the public interest in nondisclosure of the record.

*The public interest served by not disclosing the record clearly outweighs the public interest served by the disclosure of the record, therefore the record is exempt under the Public Records Act, Government Code Section 6255. The public interest in non-disclosure of the record is that disclosure of the location and waypoints would enable vandals and thieves to damage the trail. The specific waypoints developed by the Old Spanish Trail Association are analogous to the reports held by the State Historical Resources Commission, which are exempt from disclosure under Government Code Section 6254.10.*

4. State whether the information may be disclosed if it is aggregated with other information or masked to conceal other portions

*The Applicant, Old Spanish Trail Association, submitted under separate cover a general report on our investigation of the location of the mule trace of the Old Spanish Trail. The waypoints identify specific GPS locations of the trail and thus cannot be aggregated, or concealed.*

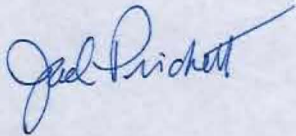
5. State how the information is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant



*The Applicant is a non-profit association dedicated to the preservation of the Old Spanish Trail. We have not disclosed the waypoints to any individual who is not a member of our association. The Applicant is a partner of the National Park Service and the BLM in the protection, preservation and interpretation of the Old Spanish National Historical Trail. Historical Trail. We will (or have) disclosed the waypoints to those governmental entities only once we are satisfied that the record of the waypoints will not be disclosed to general members of the public.*

**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. The Applicant is a 501 © (3) non-profit organization (correct?) or an association. I am authorized to make the application and certification on behalf of the Applicant.**

**Date and sign**

A handwritten signature in blue ink, appearing to read "Joel Prichett", with a stylized flourish extending from the end.

**July 23, 2012**