

# *La Paloma Generating Company, LLC*

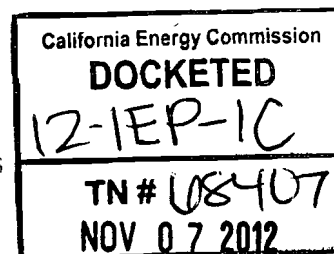
**COMPLETED**

November 6th, 2012

POB175 (Mail)  
1760 W. Skyline Road  
(Deliveries)  
McKittrick, CA 93251

661.762.6000  
Fax: 661.762.6041

California Energy Commission  
Docket Office  
Attn: Docket 12-IEP-1c  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512



To Whom It May Concern:

Attached is the completed Information Request for As-Operating Project Costs for the La Paloma Power Plant as requested.

I am also requesting confidentiality for my items to protect my institution for particular non-public information.

If there are any questions please contact me at 661-762-6053.

Best Regards,

A handwritten signature in cursive script, appearing to read "David R. Grant".

David R. Grant

Financial Manager

Attachments (2)

**APPLICATION FOR CONFIDENTIAL DESIGNATION**  
**(Cal. Code Regulations, Title 20, § 2505)**  
**DOCKET NUMBER: (12-IEP-1c)**

Applicant: La Paloma Generating Company, LLC  
Address of Applicant: P.O. Box 175, McKittrick, CA 93251

**1. (a) Title, data, and description of the record:**

The As-Operating Cost Information Request Form issued by the California Energy Commission (Energy Commission) for the La Paloma Power Plant.

(Note: The record must be attached.)

**(b) Specify the part(s) of the record for which you request confidential designation.**

La Paloma Generating Company, LLC is requesting confidential designation for the following information items listed below.

As- Operation Information Items 1, 5, 6, 7, and 8

**2. State and justify the length of time the Energy Commission should keep the record confidential.**

5 years.

**3. (a) State the provision(s) of the Public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the record confidential, and explain why the provision(s) applies to the record.**

The completed forms requested by the Energy Commission contain information that is commercially sensitive, which the applicant considers to be confidential.

(List the information/data submitted for a confidential designation and discuss why that particular piece of information/data is confidential. Each application is evaluated on a case-by-case basis. The applicant needs to justify confidentiality.)

**(b) If the record contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please also state how it would be lost, the value of the information to the Applicant, and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.**

As-Operating data provides cost data which could be used to define plant variable and fixed costs; this could impact our ability to bid or transact uncommitted merchant power competitively against other generators.

- 4. State whether the record may be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the Applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if it is aggregated or masked, explain why.**

Request that aggregated O&M cost data not be disclosed to competitors.

- 5. State how the record is kept confidential by the Applicant and whether it has ever been disclosed to a person other than an employee of the Applicant. If it has, explain the circumstances under which disclosure occurred.**

Plant cost data is not disclosed outside of the company and plant employees except under circumstances such as during the asset sale in which strict confidentiality agreements would be in place.

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.

Dated: 11-6-12

Signed: 