

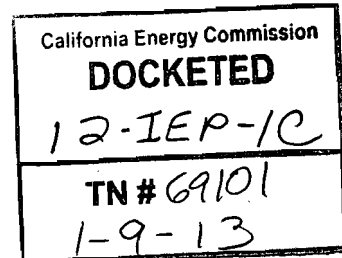
COMPLETED



ORANGE GROVE
Energy, L.P.

January 4, 2013

Orange Grove Energy, LP
1900 E. Golf Rd., Ste. 1030
Schaumburg, IL 60173



California Energy Commission
1516 Ninth Street
MS 14
Sacramento, CA 95814

Subject: Application for Confidential Designation – Request for As-Built and As-Operating Costs for the Orange Grove Power Plant

To Whom It May Concern:

Please find enclosed Orange Grove Energy, L.P.'s Application for Confidential Designation as it relates to the information submitted in the Information Request Sheets for As-Built and As-Operating Costs.

I have included the original Application for Confidential Designation as well as 5 Compact Discs which include the As-Built and As Operating Costs information sheets.

Please contact me with any questions you may have.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Christopher R. Bluse'.

Christopher R. Bluse
Manager of Asset Management

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

Applicant: Orange Grove Energy, LLP

Address of Applicant: 1900 E. Golf Road, #1030, Schaumburg, IL 60173

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

The As-Built and As-Operating Cost Information Request Form issued by the California Energy Commission (Energy Commission) for the Orange Grove Power Plant.

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

Orange Grove Energy, LLP is requesting confidential designation for the following information items listed below.

Total Capital Cost of Facility
Gas Turbine/Generator Cost (installed cost each)
Total Construction Costs (Labor/Equipment/etc.)
Cost of Linear Connection Construction
Cost of Licensing/Permitting Project
Total Annual Operating Costs and MW net/gross(Cost Should be inclusive of fuel and all other operating costs
Staffing (average annual cost – 2011 dollars)(please provide staffing in full time equivalents)

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

We request that the Commission keep this information confidential for 5 years. This will allow our firm to remain competitive in open auction request for proposals because our sensitive financial information will be protected.

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.

The information contained in the Commission's request is sensitive financial and operational information covered under Section 6254.15 of the regulation.

(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.

The information submitted by the Applicant in the Commission's request is sensitive in nature and any disclosure of said information would place the Applicant in a competitive disadvantage as well as potentially exposing our firm to breach of contract violations as it relates to confidentiality provisions for certain contracts/agreements that have been entered into. The information contained in this request is not publicly disclosed.

- 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.**

The record may be disclosed so long as the data is aggregated and there is not possibility to identify the individual source of the information once the record has been aggregated with other records.

- 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.**

The record is kept confidential by limited access to the information as well as confidentiality provisions within the firm's employee handbook. The record has never been disclosed to any person other than an employee of the Applicant.

Attachment 2

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: 1/11/2013

Signed: Christopher R. Bluse

Name: Christopher R. Bluse
(Typed or Printed)

Title: Manager of Asset Management
(Typed or Printed)