



**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE CALIFORNIA NATURAL RESOURCES AGENCY**

APPLICATION FOR CONFIDENTIAL DESIGNATION

I, Rituraj Yadav, declare:

1. I am Associate Manager for Wildfire Mitigation of LS Power Development, LLC and am authorized to submit this application for confidential designation on behalf of LS Power Grid California, LLC (“LSPGC”) to the Office of Energy Infrastructure Safety.
2. This application is made under California Code of Regulations Title 14, Division 17, Chapter 1, Article 3, § 29200 for the purpose of requesting confidential treatment of the document(s) submitted in connection with the 2026 – 2028 Base Wildfire Mitigation Plan submission and described in the following table.
3. As required by § 29200(b), this application includes:

A. Title and Description of Document(s):

Attachment	File Name	Document Title
A	LSPG Operations Alarm Standard v3	LSPG Operations Alarm Standard
B	LSPGC EOP-011 Emergency Operations Plan v.1	Emergency Operations Plan
C	LSPG Operations Training Process Manual v5.2_Attach J	Attachment J of Operations Training Process Manual
D	Exhibit G – LTSA (12-16-20)xc	LSPGC Long Term Service Agreement

Attachment A cannot reasonably be redacted, because the entire document details LSPGC’s security-related protocols;



Attachment B cannot reasonably be redacted, because the entire document details LSPGC's security-related protocols and emergency response plans; and

Attachment C cannot reasonably be redacted, because the entire document details LSGPC employees' personally identifiable information. LSPGC notes that it is only requesting confidential treatment for Attachment J of the broader Operations Training Process Manual.

Attachment D cannot reasonably be redacted, because the entire document constitutes another company's product that we are not authorized to share publicly.

B. Statement Supporting Confidential Designation

(1) Statutory Basis for Confidentiality:

☒ Gov't Code §§ 6254 et seq. (now recodified at §§ 7920.000 et seq.) [Attachment D]

☒ Cal. Const., Art. I, § 1 [Attachment C]

☒ Civil Code §§ 1798 et seq. [Attachment C]

☒ Public Utilities Code § 8380 [Attachments A and B]

☐ Evidence Code § 1060

☒ 18 C.F.R. § 388.113 [Attachments A and B]

☐ Other: N/A

(2) Reason Each Exemption Applies:

- a) Attachment A – Document contains security-related protocols protected by California's Public Utilities Code and federal CEII regulations.

- b) Attachment B – Document contains security-related protocols and emergency response plans protected by California’s Public Utilities Code and federal CEII regulations.
- c) Attachment C – Document contains employees’ personally identifiable information protected by the California Constitution and California Civil Code.
- d) Attachment D – Document contains another company’s product that we are not authorized to share publicly. Public release would violate our legal obligations and another company’s rights, while the public value of disclosure is minimal; therefore, this document is protected by the public interest balancing test of Gov’t Code § 7922.000.

(3) Duration of Confidentiality Requested:

- a) Attachment A – ☐ 3 years ☐ 5 years ☒ Indefinite ☐ Other: _____
- b) Attachment B – ☐ 3 years ☐ 5 years ☒ Indefinite ☐ Other: _____
- c) Attachment C – ☐ 3 years ☐ 5 years ☒ Indefinite ☐ Other: _____
- d) Attachment D – ☐ 3 years ☐ 5 years ☒ Indefinite ☐ Other: _____

(4) Certification:

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.

x *Rituraj Gadav*

C. Trade Secret or Competitive Harm Statement



☒ Not applicable

☐ Applicable

Executed on 07/25/2025 at Austin, Texas.

Signature:

x *Rituraj Yadav*

Rituraj Yadav

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