



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

APPLICATION FOR CONFIDENTIAL DESIGNATION

I, Ross Hohlt, declare:

1. I am Director, Asset Management 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 Data Requests 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	OD_Sub Inspection Sheet_7-24-2025.pdf	Orchard Sub July Inspection

Attachment A contains the unredacted document which contains confidential information.

B. Statement Supporting Confidential Designation

(1) Statutory Basis for Confidentiality:

-Gov’t Code §§ 6254 et seq. (now recodified at §§ 7920.000 et seq.)

OEIS has the legal right to prevent disclosure of information containing confidential business information and trade secrets.

-CA Evidence Code § 1060

Completed transmission substation inspection reports are LSPGC business confidential information for the reasons described below.

(2) Reason Each Exemption Applies:

- a) Attachment A – As an independent transmission operator, LSPGC's CA transmission facilities have all been the result of successful competitive transmission proposals originating in the California ISO's planning process. Competitive transmission solicitations take into consideration the means, methods, processes, and results of core operations and maintenance activities such as substation inspections. Public disclosure of these details would be of interest to LSPGC's competitors and could impact LSPGC's ability to compete for future projects.

(3) Duration of Confidentiality Requested:

- a) Attachment A – ☐ 3 years ☐ 5 years ☒ Indefinite ☐ Other: _____

The processes, means, and results of LSPGC substation inspections are business confidential and will impact LSPGC's ability to compete for additional transmission infrastructure projects indefinitely.



(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

C. Trade Secret or Competitive Harm Statement

LSPGC's detailed inspection records are business confidential information and the associated records are a critical part of the evaluation of competitive transmission projects. Disclosure of site-specific inspection records would give LSPGC's competitors additional insight into LSPGC's processes which could be used against LSPGC in the future. Detailed inspection results are unable to be duplicated as the data obtained during the inspection requires site access which can only be obtained credentialed personnel pursuant to NERC Critical Infrastructure Protection Standards.

Executed on August 12, 2025 at Chesterfield, MO.

Signature:

X

Ross Hohlt

Director, Asset Management
LS Power Grid California, LLC