



**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 following document submitted in connection with the Data Request No OEIS-P-WMP_2025-LSP-002 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	LSPGC EOP-011 Emergency Operations Plan v.1	Emergency Operations Plan

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

B. Statement Supporting Confidential Designation

(1) Statutory Basis for Confidentiality:

- ☒ Gov't Code §§ 6254 et seq. (now recodified at §§ 7920.000 et seq.)
- ☐ Cal. Const., Art. I, § 1
- ☐ Civil Code §§ 1798 et seq.
- ☐ Public Utilities Code § 8380
- ☐ Evidence Code § 1060
- ☒ 18 C.F.R. § 388.113
- ☒ Other: 6 U.S.C. § 131, 6 C.F.R. § 29.2.

(2) Reason Each Exemption Applies:

1. Attachment A – Document contains security-related protocols and emergency response plans protected by California's Public Utilities Code and federal CEII and CII regulations. Near real-time disclosure of grid asset health information could pose reliability risks to the transmission system by disclosing potential vulnerabilities that could be misused by bad actors. Gov't Code §§ 7922.000, 7927.705, 7929.205; 6 U.S.C. § 131; 6 C.F.R. § 29.2; 18 C.F.R. § 388.113.

(3) Duration of Confidentiality Requested:

1. Attachment A – ☐ 3 years ☐ 5 years ☒ Indefinite ☐ Other: _____

Because this document contains emergency operations plan specifics that will not meaningfully change in the foreseeable future and because these specifics

constitute sensitive security-related protocols, we are requesting indefinite confidential treatment.

(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

(1) Specific competitive advantage: LSPGC, in its Emergency Operations Plan, has constructed detailed asset health and performance records for its system, the knowledge of which is critical to the efficient, safe, and reliable operation of the grid, in addition to the ability to compete for future projects.

(2) How it would be lost through disclosure: Competitors of LSPGC could use this Emergency Operations Plan as a resource to gain a competitive advantage against LSPGC in its future project bids. Revealing to competitors LSPGC's best practices for mitigating transmission system operating emergencies, capacity and energy emergencies, and extreme weather and environmental emergencies would likely put LSPGC at an undue competitive advantage.



(3) How others could replicate: Competitors could obtain LSPGC's detailed asset health and performance records to guide their own business decisions and plans for their assets and could expose LSPGC's system information to undue scrutiny by competitors.

Executed on August 12, 2025, at Austin, Texas.

Signature:

x Rituraj Yadav

Rituraj Yadav

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