



**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 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. §§ 101(4), 650(4), 671(3); 42 U.S.C. § 5195c; 6 C.F.R. § 29.2.

(2) Reason Each Exemption Applies:

- a) Attachment A – Document contains security-related protocols and emergency response plans protected by California’s Government Code and federal CII regulations. The EOP details LSPGC’s plan for mitigating the transmission system operating emergencies, capacity and energy emergencies, and extreme weather and environmental emergencies. LSPGC’s infrastructure would find information regarding LSGPC’s process for assessing transmission system vulnerability and the location of the infrastructure valuable. The public interest is substantially served by protecting the reliability of the transmission system from potential vulnerabilities and is not substantially served by accessing detailed emergency operations plans for the transmission system. Gov’t Code § 7922.000. LSPGC’s Emergency Operations Plan is protected under CII rules, because it includes information related to the security of systems that are vital to national public health and safety and not customarily in the public domain. See 6 U.S.C. §§ 101(4), 650(4), 671(3); 42 U.S.C. § 5195c; 6 C.F.R. § 29.2. LSPGC is not required to disclose records that are exempted under federal or state law, including federal CII regulations and the cited California Government Code

sections. Gov't Code § 7927.705. LSPGC is not required to disclose CII as defined by Title 6, Section 131(3) of the U.S. Code (recodified as 6 U.S.C. § 671(3)). Gov't Code § 7929.205(b).

(3) Duration of Confidentiality Requested:

a) 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 detailed practices for mitigating transmission system operating emergencies, capacity and energy emergencies, and extreme weather and wildfire emergencies 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 wildfire emergencies would likely put LSPGC at an undue competitive advantage.

(3) How others could replicate: Competitors could obtain LSPGC's detailed practices for mitigating transmission system operating emergencies, capacity and energy emergencies, and extreme weather and wildfire emergencies 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 21, 2025, at Austin, Texas.

Signature:

x *Rituraj Yadav*

Rituraj Yadav

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