Application for Confidential
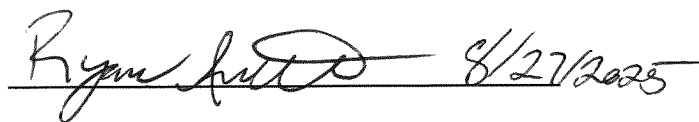Designation and
Declaration in Support

I, Ryan Anthon, declare and state:

1. I have primary responsibility for the microgrid feasibility studies which are
being submitted to the Office of Energy Infrastructure Safety (OEIS). I am
authorized to request confidential treatment via this certification on behalf
of PacifiCorp.

2. Under California Code of Regulations Title 14, Division 17, Chapter 1, Article 3, §
29200(a), PacifiCorp requests that four microgrid feasibility studies, completed by
BoxPower, a consultant company contracted by PacifiCorp to do the studies, be
granted a "confidential designation" by the Office of Energy Infrastructure Safety.
Under 14 CCR §29200, PacifiCorp has identified the required showing for
subsection (b)(3)(A) through (D) in paragraphs 4,5,6, and 8 of this declaration.
Additionally PacifiCorp has identified the required showing under subsection (c) of
the rule in paragraph 7 of this declaration. The four microgrid feasibility studies are
titled as follows with the filename identified and the title of the document in
parenthesis:

   - Attach OEIS 6.1-1 1st Supp CONF (#4EASI Report - PacifiCorp - HRR13 2024-0823)
   - Attach OEIS 6.1-2 1st Supp CONF (#2EASI Report - PacifiCorp - 5G16 - 2024-0614)
   - Attach OEIS 6.1-3 1st Supp CONF (#IEASI Report - PacifiCorp - Slatter Butte Lookout -
     2024-0321 v2)
   - Attach OEIS 6.1-4 1st Supp CONF (#3EASI Report - PacifiCorp - 5G171- 2024-0614)

3. Redacted Copy. A redacted copy is not being submitted. The underlying contract
with BoxPower includes a confidentiality clause prohibiting disclosure to third
parties. BoxPower has consented to production to OEIS so long as the entire
studies are maintained as confidential.

4. Statutory Basis. In making this request for confidential designation, PacifiCorp relies
upon Section 7922.000 of the California Government Code in making this request,
including the central balancing analysis that "the public interest served by not
disclosing the record clearly outweighs the public interest served by disclosure of the
record." CA GOVT§ 7922.000. This information is **commercially sensitive
information**, PacifiCorp additionally points to the Civ. Code §§3426 et seq.; Govt.
Code§§ 6254, et seq., e.g., 6254(e), 6254(k), 6254.15; Govt. Code§ 6276.44; Evid.
Code §1060; Govt. Code§§ 6254(k), 6254.15. This information is also **third party
information** subject to obligations by PacifiCorp to maintain its confidentiality,
PacifiCorp additionally points to Govt. Code§ 6254(k).

5. <u>Reasons Why Each Exemption Claimed Applies to the Information.</u> The confidential designation is based on recognized exemptions, for the following reasons:

This is commercially sensitive information that has been developed by BoxPower and that PacifiCorp is contractually obligated to protect from disclosure. Disclosure of this information would harm PacifiCorp's ability to contract with this vendor and competitively harm BoxPower by disclosing trade secret information about their proprietary methods and technology. The studies contain proprietary information related to system design, implementation and pricing. The studies also contain extremely granular site-based location and loading information that could disclose customer personally identifiable information. As a result, this information needs to be protected from public disclosure. The public interest served by protecting the subject information from disclosure therefore outweighs the public interest served by disclosing it. (CA. GOVT§ 7922.000.)

6. <u>Length of Time.</u> PacifiCorp requests that the confidential information be kept confidential indefinitely.

7. <u>Trade Secret and/or Loss of Competitive Advantage.</u> This is commercially sensitive information that has been developed by BoxPower and that PacifiCorp is contractually obligated to protect from disclosure. Disclosure of this information would harm PacifiCorp's ability to contract with this vendor and competitively harm BoxPower by disclosing trade secret information about their proprietary methods and technology. The studies contain proprietary information related to system design, implementation and pricing. As a result, this information needs to be protected from public disclosure.

8. <u>Certification</u>: 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 I am authorized to make the application and certification on behalf of PacifiCorp.

Print name: Ryan Anthon

Title: Director, Grid Modernization