

DOCKETED

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FRESNO COUNTY FIRE

PROTECTION DISTRICT

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Dustin Hail
Fire Chief
Fresno County Fire Protection District
June 5, 2025

Drew Bohan
Executive Director
715 P Street
Sacramento, CA 95814

Dear Drew Bohan,

I am writing to request that item "B" and item "C" under Worker Safety-12 of the Darden Clean Energy Project Updated Staff Assessment released on 5/12/2025 be reconsidered after reviewing the accompanying information. Fresno County Fire Protection District consulted with the County of Fresno Assessors Office to verify IP Darden's statement regarding their portion of property taxes. The information provided by IP Darden was assumed and did not include any confirmed property tax numbers from the County of Fresno.

Fresno County Fire Protection District also requests that the original Funding methodology be added back into the staff assessment after reviewing the Funding Methodology Report for BESS and PV Projects (May 2025) completed by Capitol Public Finance Group, LLC.

We are committed to being a good partner with IP Darden. Our priority will always be to provide reliable, professional emergency response to the citizens of Fresno County including new and existing developments. Any development in underserved areas within Fresno County that doesn't enhance fire protection services is a reduction to the tax paying citizens and communities.

We appreciate the opportunity to provide further comment on this matter and ask that the CEC board place the well-being and protection of the citizens of Fresno County at the forefront of their decisions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dustin Hail".

Dustin Hail
Fire Chief
Fresno County Fire Protection District



COUNTY OF FRESNO
OFFICE OF THE ASSESSOR-RECORDER

Paul Dictos, CPA
Assessor-Recorder

June 5, 2025

Drew Bohan
Executive Director
California Energy commission
715 P Street
Sacramento, CA 95814

Dear Mr. Bohan –

I am writing to you regarding the valuation of the Darden Clean Energy Project (DCEP). According to information provided to the Fresno County Assessor's Office, the completed and assessed the DCEP is projected to generate approximately \$232 million in property taxes for the County over the first ten years, with \$45million allocated to the Fire Department.

For simplicity, assuming the annual tax amounts remain constant over the ten year period, this would equate to \$23.2 million per year for the County and \$4.5 million per year for the Fire Department.

Based on these figures, I derived the following assessed values using the provided tax rates:

	Taxes 1 year	Tax Rate	Calculation (taxes/tax rate)	Derived Value (assessed value)
County of Fresno	\$23,200,000	1.000%	\$23,200,000/.01	\$2,320,000,000.000
Fire Department	\$4,500,000	0.078%	\$4,500,000/.00078	\$5,769,230,769.23

The concern I wish to raise is the significant discrepancy of the derived values. While I understand that different tax rates apply to different entities, both tax amounts should ultimately be based on the same underlying assessed value.

"Strengthening the financial foundation of Fresno County"

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COUNTY OF FRESNO
OFFICE OF THE ASSESSOR-RECORDER

Paul Dictos, CPA
Assessor-Recorder

Without further information on how these taxes were calculated, I cannot determine which (if either) is accurate. Therefore, I believe this inconsistency warrants review.

Thank you for your time and consideration.

Yours truly,

Jo Ann Ebisuda
Deputy Assessor

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FUNDING METHODOLOGY FOR BESS AND PV PROJECTS

MAY 2025



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SECTION 1: BACKGROUND

The Fresno County Fire Protection District ("District") has asked Capitol Public Finance Group to assist with confirming the Funding Methodology for addressing health and safety concerns for the construction and operation of solar photovoltaic (PV) and battery energy storage systems (BESS) facilities (together, "PV Projects").

The District provides fire prevention and suppression, emergency medical response, search and rescue and emergency dispatch services. The District service area encompasses approximately 4,213 square miles, extending from Kings and Tulare Counties on the South to Madera County on the North and from the coastal range on the West to the foothills of the Sierras on the East. District boundaries encompass unincorporated "islands" that are surrounded by the Cities of Clovis and Fresno. The communities of Huron and San Joaquin are included within the District and the cities of Mendota, Fowler and Parlier contract with the District for District Services.

The bulk of existing and proposed PV Projects exist in the western part of Fresno County. The west side of Fresno County requires additional resources to respond to fire, rescue, and emergency medical services to the proposed PV Projects in an appropriate response time while maintaining the current level of service to existing towns and energy facilities. District stations on the western side of the County are presently staffed and equipped to handle emergency responses to the growing population of communities on the west side of the County including Mendota, Tranquility, San Joaquin, Coalinga, and others.

The District's resources in the western portion of the County require enhancement to maintain and provide the current level of service to existing communities and to the proposed PV Projects. New and expanded fire stations, personnel, water tenders, engines and other capital and operating costs have been identified by the District to adequately serve the proposed PV Projects.

This report supports the Funding Methodology approved by the District Board on April 2, 2025. The Funding Methodology allocates the estimated amount of costs needed to serve the estimated buildout of PV Projects in the District's boundaries to the megawatts produced/stored by type of project. The Funding Methodology is based on the industry standard 4-hour megawatt system and may be converted in a fractional amount as needed. The District has the flexibility to alter the list of needs and costs shown in this report as conditions change. If the overall development of PV Projects is greater or lesser than estimated, the amount of personnel and capital costs will adjust proportionally.



SECTION 2: PV PROJECTS

The following table includes the current known list of proposed PV Projects in the District. There is an estimated 11,058 of BESS megawatts and 17,275 of Solar megawatts. The bulk of existing and proposed solar PV Projects exist or are planned in the western part of Fresno County served by the District.

TABLE 1

Megawatts Produced by Project		
Project Name	BESS MW	Solar MW
IP Darden	4,600	1,150
San Luis West	30	125
Sonrisa	184	200
Luna Valley	200	200
Heartland	300	300
Cornucopia	300	300
Key Storage	300	0
Midway	30	0
Panoche	14	0
Rosemary	100	0
VCIP	5,000	15,000
Total Megawatts Produced	11,058	17,275

Source: California Energy Commission

SECTION 3: DISTRICT RESPONSE MAP

As shown in **Figures 1 and 2**, the District's current fire engine and water tender response does not reach large areas of the western portion of the District where the majority of PV Projects exist or are planned. The future stations, apparatus and necessary personnel will provide adequate fire engine and water tender response times to the PV Projects as illustrated in **Figure 3**.

FIGURE 1

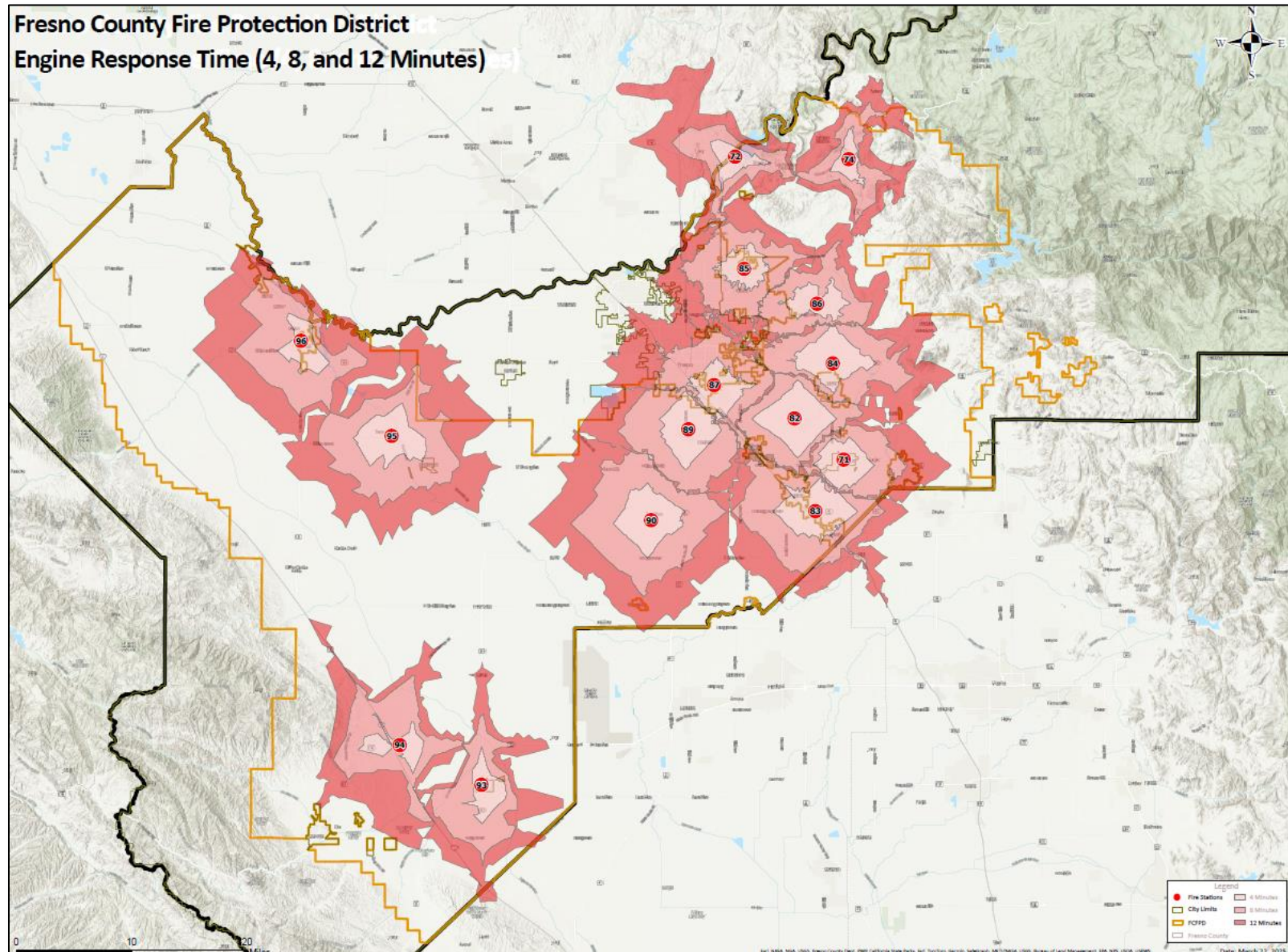


FIGURE 2

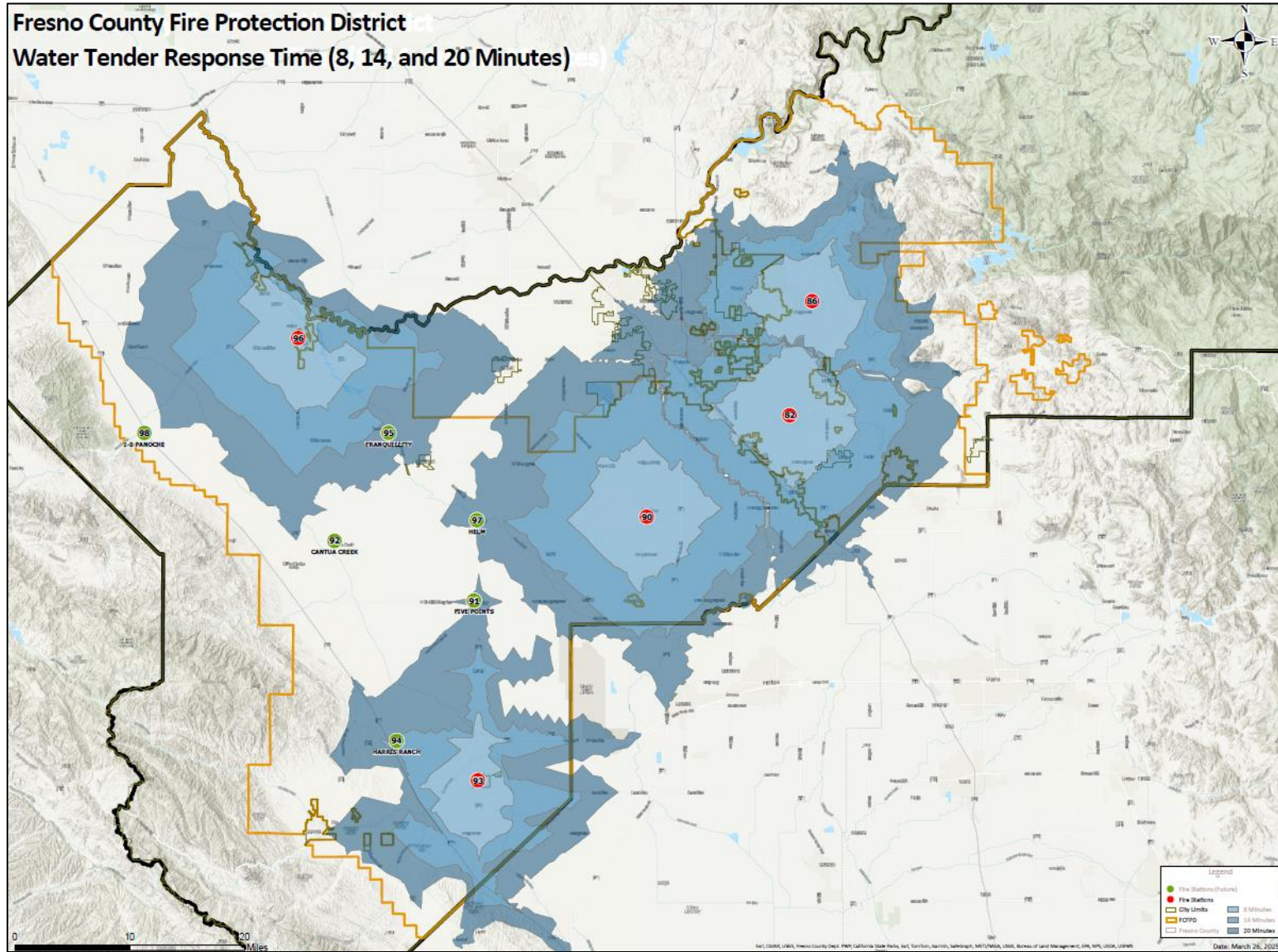
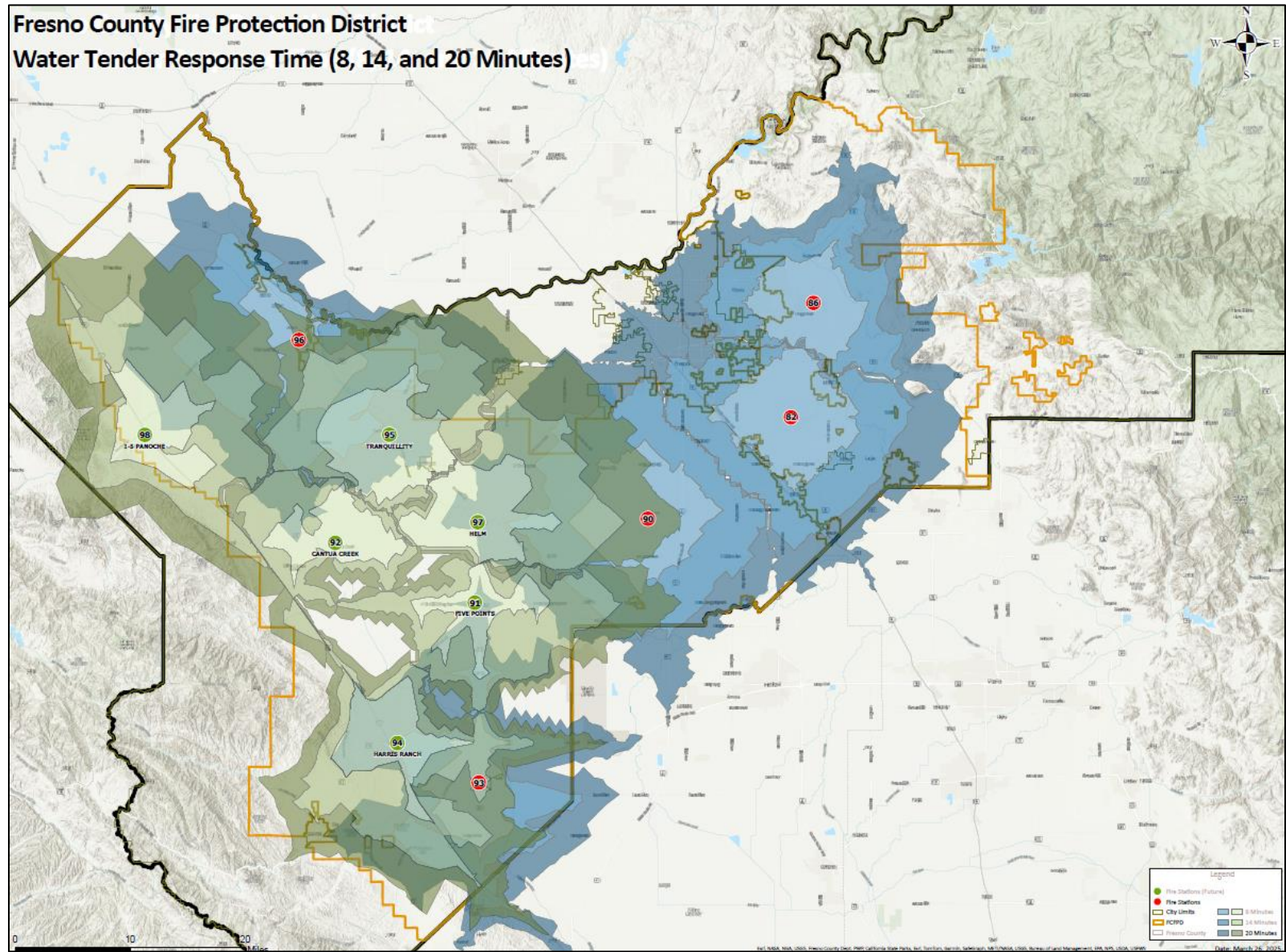


FIGURE 3



SECTION 4: NECESSARY PERSONNEL AND FACILITIES

The addition of PV Projects will result in a reduction of services to the communities served by the District without any enhancement of firefighting resources. With the addition of PV Projects, the west side of Fresno requires the resources to respond to fire, rescue, and emergency medical services of the existing towns and energy facilities in an appropriate time. Additional and expanded fire stations, personnel, water tenders and engines have been identified as needed by the District. The bulk of existing and proposed solar PV projects exist in the western part of Fresno County.

The District has determined that there is both a direct impact and a cumulative impact on emergency response capabilities of the District to respond to fire, rescue, and medical services emergencies posed by the operation of the solar PV projects.

The District has identified, based on several factors including project size, megawatts generated, additional energy projects built, and taking into account a consideration of response times and County General Plan recommendations, needed fire flow at such facilities and special hazards that are specific to the PV Projects, the additional personnel, capital facilities, equipment and apparatus to adequately serve the fire and emergency medical service demands of the existing and proposed PV Projects.

Table 2 below shows the annual Safety personnel needs in terms of position types, number and costs.

TABLE 2

Safety Personnel		
Type	Number Needed	Total Annual Salary
DC	2	\$717,333
BC	4	\$1,047,500
Comm Op.	4	\$262,464
Captain	16	\$3,594,538
Engineer	84	\$16,230,200
Total Salary Costs		\$21,852,035
Additional Costs		
Uniforms		\$19,525
Overtime		\$4,860,000
Total Additional Costs		\$4,879,525
Subtotal Personnel Costs		\$26,731,560
Admin Rate (10.77% Subtotal)		\$2,878,989
Total Safety Personnel Costs		\$29,610,549

Source: Fresno County Fire Protection District

Table 3 below shows the annual Non-Safety personnel needs in terms of position types, number, costs and related costs.

TABLE 3

Non-Safety Personnel and Related Costs		
Personnel Type	Employees /Numbers Needed	First Year and Annual Cost
Fire Inspectors	2	\$130,000
IT Administrator	1	\$95,000
District Clerical Staff	1	\$46,000
Equipment Services Assistants (Parts) & (Fire Equip.)	1	\$60,000
Administration Officer	1	\$126,000
Administrative Analyst	1	\$72,000
Construction Manager	1	\$160,000
Heavy Equipment Mechanic	4	\$484,000
Total Needed Personnel	12	\$1,173,000
Personnel Benefits/Needs		
Benefits	13	\$270,769
Unemployment Payments	13	\$6,154
Uniforms- PCF/Sch C	20	\$13,600
Payroll Tax Expense	13	\$114,462
Workers Compensation	13	\$135,385
Cellular Services		\$44,460
Total Personnel Benefits/Needs		\$584,829
Total Non-Safety Personnel and Related Costs		\$1,757,829

Source: Fresno County Fire Protection District

Table 4 below shows the annual repairs and maintenance by type and costs.

TABLE 4

Repairs and Maintenance	
Type	First Year and Annual Cost
Maintenance - General (Minor) Equipment	\$2,668
Maintenance - Communications (Radio Equipment)	\$4,000
Maintenance - Vehicle (Automotive)	\$186,668
Diesel Exhaust Fluids	\$1,067
Maintenance - Auto Defibrillator	\$400
Maintenance- SCBA/TIC/Air Monitor/Jaws/Small Engine	\$8,000
Maintenance- Structure/Improvements/Grounds	\$37,333
Fleet Services Technician (Graphics)	\$24,533
Transportation/Travel Claim	\$8,000
Transportation Mileage	\$933
Gasoline	\$29,867
Diesel	\$108,000
Red Dyed Diesel (Dozer & Tractors)	\$2,267
BOE Diesel Fuel Taxes	\$1,360
Total Repairs and Maintenance	\$415,096

Source: Fresno County Fire Protection District

Table 5 below shows the annual firefighting clothing and equipment by type and costs.

TABLE 5

Firefighting Supplies, Equipment and Services	
Type	First Year and Annual Cost
Supplies	\$83,990
Equipment	\$416,752
Services	\$681,364
Total Supplies, Equipment & Services Costs	\$1,182,106

Source: Fresno County Fire Protection District

Table 6 below shows the first year and annual capital apparatus and equipment by number, type and costs.

TABLE 6

Capital Apparatus, Vehicles and Equipment			
Type	Number Needed	First Year Cost	Annual Cost
Apparatus and Vehicles			
Fire Engine (Type1)	4	\$4,680,000	\$576,000
Water Tenders	8	\$5,600,000	\$544,000
Command Vehicles	10	\$1,100,000	\$160,000
Capital Outlay - Engines (Type 3)	8	\$5,600,000	\$544,000
Utility Truck	5	\$350,000	\$35,000
HEM Vehicle	4	\$1,200,000	\$128,000
HAZ MAT Command Vehicle	1	\$2,000,000	\$100,000
Total Apparatus and Vehicles Costs	40	\$20,530,000	\$2,087,000
Fire Equipment Costs		\$67,467	\$262,667
Total Capital Apparatus, Vehicles and Equipment Costs		\$20,597,467	\$2,349,667

Source: Fresno County Fire Protection District

Table 7 below shows the first year and annual capital facilities by type and costs.

TABLE 7

Capital Facilities		
Type	First Year Cost	Annual Cost
Training Center	\$7,000,000	\$200,000
Station/Facilities Capital Improvements	\$160,000	\$160,000
Station Improvement Projects	\$160,000	\$160,000
New Station 91 Project	\$12,000,000	\$305,000
New Station 92 Project	\$12,000,000	\$305,000
New Station 97 Project	\$12,000,000	\$305,000
New Station 98 Project	\$12,000,000	\$305,000
Station 93	\$4,000,000	\$70,000
Station 94	\$4,000,000	\$70,000
Station 95	\$4,000,000	\$70,000
Station 96	\$4,000,000	\$70,000
Total Capital Facilities	\$71,320,000	\$2,020,000

Source: Fresno County Fire Protection District

The total additional personnel, capital facilities, equipment and apparatus to adequately serve the fire and emergency medical service demands of the existing and proposed PV Projects in the District, are summarized in **Table 8**.

TABLE 8

Summary of Future Needs Costs		
Type	First Year Cost	Annual Cost
Safety Personnel	\$29,610,549	\$31,091,077
Non-Safety Personnel	\$1,757,829	\$1,757,829
Repairs and Maintenance	\$415,096	\$415,096
Supplies, Equipment & Services	\$1,182,106	\$1,182,106
Capital Equipment	\$20,597,467	\$2,349,667
Capital Facilities	\$71,320,000	\$2,020,000
Total Future Needs Costs	\$124,883,047	\$39,202,009

Source: Fresno County Fire Protection District



SECTION 5: PV PROJECT COST CALCULATION

To ensure the funding of personnel, new facilities, apparatus and equipment as well as an enhancement to existing facilities, we have allocated the identified personnel, capital facilities, equipment and apparatus with the proposed PV Projects. This results in a one-time initial payment and an adjustable annual cost on a per Mega Watt basis by Solar and BESS, for the PV Projects within the District's boundaries.

For the purpose of this analysis, we are estimating approximately 56% of the total costs are allocated to BESS megawatts due to the higher amount of fire fighting needs as compared to Solar megawatts. **Table 9** allocates the First Year Cost and Annual Cost, by BESS and Solar, with the estimated amounts of megawatts produced or stored by each type of PV Project.

TABLE 9

Cost per Megawatt		
Type	First Year Cost	Annual Cost
BESS Cost per Megawatt		
BESS Future Needs Allocated Costs	\$70,171,784	\$22,027,609
BESS Projected Megawatts Produced	11,058	11,058
BESS Future Needs Costs per Megawatt	\$6,346	\$1,992
Photovoltaic Cost per Mega Watt		
Photovoltaic Future Needs Allocated Costs	\$54,711,263	\$17,174,400
Photovoltaic Projected Megawatts Produced	17,275	17,275
Photovoltaic Future Needs Costs per Megawatt	\$3,167	\$994
Total Future Needs Costs per Megawatt	\$9,513	\$2,986



SECTION 6: CONCLUSION

This report supports the Funding Methodology approved by the District Board on April 2, 2025. The addition of PV Projects will result in a reduction of service to the communities served by the District without an appropriate increase of firefighting resources. This report calculates the Funding Methodology based on the existing and proposed PV Projects and the personnel, new facilities, apparatus and equipment identified by the District needed to serve them. The purpose of the Funding Methodology to ensure that new PV Projects within the District pays its share of future personnel and capital costs, which are necessary to provide fire protection, fire suppression and other fire safety services adequate to accommodate these highly specialized projects.

