

DOCKETED	
Docket Number:	25-OPT-02
Project Title:	Prairie Song Reliability Project
TN #:	265211
Document Title:	Determination of Incomplete Application and Request for Information for the Prairie Song Reliability Project
Description:	N/A
Filer:	Marichka Haws
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	8/1/2025 4:23:05 PM
Docketed Date:	8/1/2025



August 1, 2025

Garrett Lehman
Director of Development
Coval Infrastructure
140 Broadway, 46th Floor
New York, NY 10005-1155

**Determination of Incomplete Application and Request for Information for the
Prairie Song Reliability Project (25-OPT-02)**

Dear Garrett Lehman:

California Energy Commission (CEC) staff confirmed receipt on July 2, 2025, of an Opt-In Application for the Prairie Song Reliability Project (project) (25-OPT-02). Prairie Song Reliability Project, LLC (applicant) proposes to construct, own, and operate the project, a 1,150-megawatt (MW), 9,200 MW hour battery energy storage system (BESS). The project would be located on approximately 107 acres of privately owned land in the Antelope Valley of northern Los Angeles County, south of State Route 14, approximately three miles northeast of the unincorporated community of Acton. In addition to the containerized BESS facility utilizing lithium-iron phosphate cells, or similar technology, the project would include operations and maintenance buildings, an on-site project substation, either a 1.1-mile or 1.8-mile 500-kilovolt (kV) overhead generation interconnection (gen-tie) transmission line, and interconnection facilities within the existing Southern California Edison (SCE)-owned and operated Vincent Substation.

To accommodate the interconnection of the project, the applicant would construct and own the portion of the gen-tie line between the project substation and the Point of Change of Ownership (POCO) transmission structure, and SCE would construct and own the remaining portion of the gen-tie from the POCO to the point of interconnection within the SCE Vincent Substation.

CEC staff has completed its review of the project application pursuant to California Code of Regulations, title 20, section 1877, which specifies the required contents of an Opt-In application and Public Resources Code, section 25545.4(a), and which states, "within 30 days of the submission of the application, the commission shall review the application and make a determination of completeness." Based on this review, CEC staff has determined the submitted application is incomplete.

Pursuant to Public Resources Code, section 25545.4(b), CEC staff requires the information described in the attachments to this letter be submitted. The attachments

consist of: (1) data completeness worksheets listing the requirements specified in statute and regulations; and (2) requests for additional information needed for staff to complete its environmental and other analyses of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to perform a related review for Opt-In applications. CEC staff's review of the application has identified initial topics of concern that could impact the project which are described in detail in the data requests (Attachment B). In general, the submitted materials do not provide adequate information to meet application requirements for most topics.

All requested information is reasonably necessary to prepare an Environmental Impact Report as part of a CEC Staff Assessment and to support a decision on the application, including all the findings required in Chapter 6.2 of Division 15 of the Public Resources Code.

CEC staff asks the applicant to file complete responses by technical area to the requested data in as few submittals as possible and provide an estimated timeline of when the remaining data will be submitted. CEC staff asks that upon submitting complete responses, the applicant provide a statement that its response to the request for information is complete and addresses all identified deficiencies.

Consistent with Public Resources Code, section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, *accompanied by a statement from the applicant that its response to this request for information is now complete and addresses all identified deficiencies*, CEC staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter.

If you have any questions about the information identified as necessary to complete the application, please email the CEQA project manager, Lisa Worrall, at Lisa.Worrall@energy.ca.gov.

Sincerely,



Drew Bohan
Executive Director

Attachments

Attachment A: Data Completeness Worksheets for California Code of Regulations, Title 20, section 1877

Attachment B: Data Requests

Prairie Song Reliability Project (25-OPT-02) Completeness Review

Incomplete

1. Mandatory Opt-in Requirements
2. Air Quality (includes Greenhouse Gases)
3. Alternatives
4. Biological Resources
5. Cultural/Tribal Cultural Resources
6. Geological Hazards
7. Hazardous Materials Handling
8. Land Use
9. Paleontological Resources
10. Project Description
11. Public Health
12. Socioeconomics
13. Soils
14. Traffic and Transportation
15. Transmission System Design
16. Waste Management
17. Water Resources
18. Wildfire
19. Worker Safety and Fire Protection

Complete

1. Efficiency, Energy, and Energy Resources
2. Executive Summary
3. Facility Design
4. Noise and Vibration
5. Reliability
6. Transmission System Safety and Nuisance
7. Visual Resources

Attachment A

Data Completeness Worksheets
for Title 20, section 1877

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: **Mandatory Opt-In Requirements**

Project: Prairie Song Reliability Project

Technical Staff: Various

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
AUTHORITY AND VERIFICATION				
Cal. Code Regs., tit. 20 § 1707	Every notice and application shall be dated and signed by the applicant attesting under penalty of perjury to its truth and accuracy.	Subsection 1.6.1, p. 1-8; Appendix 1D	Yes	
"FACILITY" OR "DISCRETIONARY PROJECT" DEFINITION MET				
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)	Explanation of how the facility meets one or more of the definitions of "facility":	Subsection 1.6.2, p. 1-9	Yes	
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)(4)	If the opt-in application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application shall contain a detailed description of how the facility meets the criteria specified in section 2554(c)5(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technologies.	Subsection 1.6.2, p. 1-9	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
Mandatory Opt-In Requirements
 Technical Area: Prairie Song Reliability Project Technical Staff: Various
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE				
Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.	Subsection 1.6.3, pp. 1-9 to 1-10; Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	Subsection 1.6.3, pp. 1-9 to 1-10; Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(a)	The entirety of the construction of the covered project is a public work.	N/A	N/A	N/A
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following apply:	Subsection 1.6.3, pp. 1-9 to 1-10; Appendix 1C	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: Mandatory Opt-In Requirements Project: Prairie Song Reliability Project Technical Staff: Various

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(1)	Applicant ensures that the prevailing wage requirement is included in all contracts for the performance of all construction work.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(2)	Contractors and subcontractors must pay all construction workers employed in the construction of the project at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(3)	Contractors and subcontractors performing construction work on the project shall employ apprentices at no less than the ratio required in the Labor Code section 1777.5.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(4)	Except as provided in (b)(6), all contractors and subcontractors performing construction work shall maintain and verify payroll records pursuant the Labor Code section 1776, make those records available for inspection and copying, and furnish those payroll records to the Labor Commissioner pursuant to the Labor Code section 1771.4.	Appendix 1C	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: Mandatory Opt-In Requirements Project: Prairie Song Reliability Project Technical Staff: Various

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	Appendix 1C	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: **Mandatory Opt-In Requirements** Project: Prairie Song Reliability Project Technical Staff: Various

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	Appendix 1C	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Mandatory Opt-In Requirements** Revision No. 0 Date: August 2025

Technical Area: Prairie Song Reliability Project Technical Staff: Various

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	Appendix 1C	Yes	

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Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: **Mandatory Opt-In Requirements**

Project: Prairie Song Reliability Project

Technical Staff: Various

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 1C	Yes	
PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)				
Cal. Code Regs., tit. 20, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	Subsection 1.6.4, p. 1-10; Biological Resources: Lake and Streambed Alteration Agreement Application (TN 264472, 264477, and 264476); Subsection 3.1.7, p. 3.1-64	No	See DR AQ-1, DR BIO-6 through DR BIO-12, DR BIO-14, DR BIO-25, DR BIO-34

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Revision No. 0 Date: August 2025

Technical Area: **Mandatory Opt-In Requirements**

Project: Prairie Song Reliability Project

Technical Staff: Various

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA				
Cal. Code Regs., tit. 20, § 1877(e)	Identify whether the project is, on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	Subsection 1.6.5, p. 1-11	Yes	
NET POSITIVE ECONOMIC BENEFIT TO THE LOCAL GOVERNMENT				
Cal. Code Regs., tit. 20, § 1877(f)	Identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. Staff must provide the submitted information to the local government for review and comment.	Subsection 1.6.6, pp. 1-11 to 1-12; Appendix 1E; subsection 3.10.2.3.3 pp. 3.10-17 to 3.10-20; Appendix 3.10A	No	See DR MAND-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Mandatory Opt-In Requirements** Revision No. 0 Date: August 2025

Technical Area: Prairie Song Reliability Project Technical Staff: Various

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20 § 1879(a)(7); Pub. Resources Code § 25545.9	... economic benefits may include, but are not limited to the following: (a) Employment growth. (b) Housing development. (c) Infrastructure and environmental improvements. (d) Assistance to public schools and education. (e) Assistance to public safety agencies and departments. (f) Property taxes and sales and use tax revenues.	Subsection 1.6.6, pp. 1-11 to 1-12; Appendix 1E; subsection 3.10.2.3.3 pp. 3.10-17 to 3.10-20; Appendix 3.10A	No	See DR MAND-1
LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT				
Cal. Code Regs., tit. 2, § 1877(g) ; Pub. Resources Code § 25545.10	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations prior to project certification, consistent with Public Resources Code section 25545.10.	Appendix 1B	Yes	
ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS				
Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.	Subsection 1.6.8, pp. 1-12 to 1-13	Yes	
Pub. Resources Code § 21183(a)	The project will result in a minimum investment of \$100,000,000 in California upon completion.	Subsection 1.6.8, p. 1-12	Yes	

DATA COMPLETENESS WORKSHEET

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Technical Area: Mandatory Opt-In Requirements Project: Prairie Song Reliability Project Technical Staff: Various

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	Subsection 1.6.8, p. 1-12, Appendix 1C	Yes	
Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.	Subsection 1.6.8, pp. 1-12 to 1-13	No	See DR GHG-1 to DR GHG-7
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	Subsection 1.6.8, p. 1-13	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Mandatory Opt-In Requirements**

Technical Area: Prairie Song Reliability Project Project: Prairie Song Reliability Project Revision No. 0 Date: August 2025

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Staff: Various

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.	Subsection 1.6.8, p. 1-13; Appendix 1D	Yes	
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...	Subsection 1.6.8, p. 1-13	Yes	
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...	Subsection 1.6.8, p. 1-13	Yes	
Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.	Subsection 1.6.8, p. 1-13	Yes	

DATA COMPLETENESS WORKSHEET

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Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 21180(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	--	--	--
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	Subsection 1.6.8, pp. 1-12 to 1-13; Subsection 3.1.1 and 3.1.2, pp. 3.1-2 to 3.1-16	Yes	
Pub. Resources Code § 21183.6(a)(2)	Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority: 1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to, energy efficiency, installation of renewable energy electricity generation, and reductions in vehicle miles traveled.	Subsection 1.6.8, pp. 1-12 to 1-13; Section 3.1	No	See DR GHG-1 to DR GHG-12

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 Technical Area: Prairie Song Reliability Project Project: Prairie Song Reliability Project Revision No. 0 Date: August 2025
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Staff: Various
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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>2. The remaining unmitigated impacts shall be mitigated by direct emissions reductions that also reduce emissions of criteria air pollutants or toxic air contaminants within the same air pollution control district or air quality management district in which the project is located.</p> <p>3. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate within the same air pollution control district or air quality management district in which the project is located. The offsets shall be undertaken in a manner consistent with the Health and Safety Code section 38500, including, but not limited to, the requirement that the offsets be real, permanent, quantifiable, verifiable, and enforceable, and shall be undertaken from sources in the community in which the project is located or in adjacent communities.</p> <p>4. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate from sources that provide a specific, quantifiable, and direct environmental and public</p>			

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	health benefit to the region in which the project is located.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: Air Quality Project: Prairie Song Reliability Project Technical Staff: Tianyi Wang, Jacquelyn Record, Ivan O'Brien

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.1.2 - 3.1.3, pp. 3.1-13 through 3.1-29	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.1.3.1, pp. 3.1-16 through 3.1-29; Appendix 3.1C; Subsection 3.1.3.2, pp. 3.1-29 through 3.1-49	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Subsection 3.1.8, pp. 3.1-64 through 3.1-69; Appendix 3.1C	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the	Subsection 3.1.1 to 3.1.5, pp. 3.1-2 through 3.1-63	No	See DR PH-1 to DR PH-4

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Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	Subsection 3.1.1, pp. 3.1-2 through 3.1-13	No	See DR AQ-1
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	Subsection 3.1.3.1.2, p. 3.1-29	Yes	
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Subsection 3.1.4 to 3.1.5, pp. 3.1-49 through 3.1-51	Yes	
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	N/A	N/A	N/A
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO ₂ , CH ₄ , N ₂ O, and SF ₆) from the stack, cooling towers, fuels	Subsection 3.1.3.1.2, pp. 3.1-24 through 3.1-29; Subsection 3.1.3.2, pp. 3.1-29 through 3.1-49	No	See DR AQ-2, DR GHG-1 to DR GHG-12, DR PH-1, and DR PH-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: Air Quality Project: Prairie Song Reliability Project Technical Staff: Tianyi Wang, Jacquelyn Record, Ivan O'Brien

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.			
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	Subsection 3.1.3.2.2, pp. 3.1-24 through 3.1-26 and 3.1-36 through 3.1-38	Yes	
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	Subsection 3.1.3.2, pp. 3.1-29 through 3.1-49	Yes	
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of	Subsection 3.1.2.2, pp. 3.1-14 through 3.1-16, Table 3.1-2	Yes	

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Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.			
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Subsection 3.1.1.1, pp. 3.1-2 through 3.1-3; Subsection 3.1.3.1.2, pp. 3.1-27 through 3.1-29 Table 3.1-5	Yes	
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	N/A	N/A	N/A
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air	Air quality modeling files provided separately to staff via Kiteworks due to size of files	Yes	

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	data, and an analysis of whether this data is representative of conditions at the project site.			
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:	--	--	--
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM ₁₀) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO _x), sulfur dioxide (SO ₂), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM ₁₀) and particulate matter less than 2.5 microns in diameter (PM _{2.5}) from construction-related equipment;	Subsection 3.1.3.2, pp. 3.1-29 through 3.1-41	Yes	
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5}) impacts on ambient air quality conditions of	Subsection 3.1.3.2, pp. 3.1-29 through 3.1-41	No	See DR AQ-3, DR AQ-4, DR PH-3 and DR PH-4

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	the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;			
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	Subsection 3.1.3.2.2, pp. 3.1-31 through 3.1-38	Yes	
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5} .	Subsection 3.1.3.2.2, pp. 3.1-31 through 3.1-38	Yes	
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's	--	--	--

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Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	impacts under (g)(1), provide the following information:			
Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	N/A	N/A	N/A
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	N/A	N/A	N/A
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Subsection 3.1.4, pp. 3.1-49 through 3.1-51	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the	Subsection 3.1.5, pp. 3.1-51 through 3.1-63, Table 3.1-18	Yes	

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Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.1.6, p. 3.1-64, Table 3.1-20	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.1.6, Table 3.1-20, p. 3.1-64	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has	Subsection 3.1.7, p. 3.1-64	Yes	

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Technical Area: **Air Quality** Project: Prairie Song Reliability Project Technical Staff: Tianyi Wang, Jacquelyn Record, Ivan O'Brien

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Alternatives** Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.	Subsection 4.1 to 4.10, pp. 4-1 to 4-25; Figure 4-1, p. 4-27	No	See DR ALT-1
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).	Subsection 4.5 to 4.9, pp. 4-4 to 4-24	No	See DR ALT-1

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Revision No. 0

Date: August 2025
C. Watson/A. Single/C.
Huntley/J. Miner/J.

Technical Area: Biological Resources

Project: Prairie Song Reliability Project

Technical Staff: Wood

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Subsection 3.2.1, pp. 3.2-2 through 3.2-23; subsection 3.2.2, pp. 3.2-23 through 3.2-40; Appendices 3.2A through 3.2C; Appendix 3.2F; Appendices 3-2E (TN 264475, 264474, and 264473); Lake and Streambed Alteration Agreement Application (TN 264472, 264476, and 264477).	No	See DR BIO-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.2.1.4.1, pp. 3.2-8 through 3.2-9; subsection 3.2.1.5, pp. 3.2-9 through 3.2-11; subsection 3.2.1.6, pp. 3.2-11 through 3.2-13; Appendices 3.2A through 3.2C; Appendix 3.2F; Appendices 3-2E (TN 264475, 264474, and 264473); Lake and Streambed Alteration Agreement Application (TN 264472, 264476, and 264477).	No	See DR BIO-2, BIO-3, and BIO-4
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with	Section 3.2; 3.2.8, p. 3.2-61 through 3.2-66; Appendix 3-	No	See DR BIO-5.

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	brief discussions of the relevance of each such reference.	2D (TN 264477, Section 8, p. 24).		
[OPT-IN ONLY] Cal. Code Regs., tit. 20, § 1877 (a)	If the applicant is seeking incidental take authorization as described in California Fish and Game Code section 2081(b), the application shall include the information required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10). If the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602(a)(1)(A)-(F).		No	See DR BIO-6 through DR BIO-12; (see also DR BIO-24)
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Subsection 3.2.1, p. 3.2-2 through 3.223 3.2.2, p. 3.2-23 through 3.2-42 3.2.3, p. 3.2-41 3.2.4, p. 3.2-41 through 3.2-48	No	See DR BIO-13 and DR BIO-14

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	other adopted local, regional, or statewide plan.			
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic wildlife resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity Database (CNDDB), and a citation which includes the date the CNDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include:	Subsection 3.2.1.2 to 3.2.1.4, p. 3.2-3 through 3.2-7; Subsection 3.2.1.9 to 3.2.1.10, p. 3.217 through 3.2-22; Figures 3.2-5a and 3.2-5b; Confidential figure 3.2-5a; Appendix 3.2B	No	See DR BIO-15 through DR BIO-17
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	Subsection 3.2.1.10; Appendix 3.2B	No	See DR BIO-16

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Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	Subsection 3.2.2	No	See DR BIO-16
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Subsections 3.2.5.1.3; Appendix 3.2B	No	See DR-BIO-16
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Subsections 3.2.1.10, 3.2.1.11, and 3.2.2.2.1; Appendix 3.2B	Yes	
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the CNDDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission or other responsible agency;	Subsection 3.2.1.7, 3.2.1.9, 3.2.1.10, 3.2.1.14, Section 3.2.5, and Figure 3.2-8.	Yes	See DR BIO-16, DR BIO-18, DR BIO-19, and DR BIO-20
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances;	Subsection 3.2.1.9, subsection 3.2.1.10, subsection 3.2.1.13, subsection 3.2.2.2.1, subsection 3.2.2.2.5, subsection 3.2.5.3, Table 5-1, Appendix 3.2B Subsection 3.2.1.5, Table 3.2-3, subsections 3.2.1.7 and	No	See DR BIO-20 and DR BIO-21

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Technical Staff: Wood

Project Manager: Lisa Worrall

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Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		3.2.1.14, and 3.2.2.2.1, Table 3.2-6, Subsection 3.2.2.2.5, Table 3.2-10, MM-BIO-6, Figures 3.2-7 and 3.2-9,		
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Section 3.2, pages 3.2-50 and 55	Yes	
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Section 3.2.1.13	Yes	
Appendix B (g) (13) (B)	Include a list of the species and habitat(s) observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors. Maps or aerial photographs shall include the following:	Species: page 3.2-7 and Appendix 3.2-B Habitat(s): pages 3.2-7 and 8, and 3.2-13 through 17	No	See DR-2
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under confidential cover) and 1:350,000 (for public viewing) that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDb, and the	Section 3.2	No	See DR-23

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities.			
Appendix B (g) (13) (B) (ii)	Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided.	Section 3.2.1.3.1, Appendix 3.2.F	Yes	
Appendix B (g) (13) (B) (iii)	An aerial photo depicting state and federal jurisdictional features including state waters and wetlands delineated on maps at a scale of (1:2,400) showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance if wetlands occur within 250 feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application, Regional Water Quality Control Board (RWQCB) application, or California Department of Fish and Wildlife Section 1600 et seq. permit requirements.	Appendix 3.2.F	No	See DR BIO-24

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	For projects proposed to be located within the coastal zone, also provide aerial photographs or maps as described above that identify wetlands as defined by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Provided separately to staff via Kiteworks due to size of files	No	DR BIO-25
Appendix B (g) (13) (C)	A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate biological resources including the following:	Section 3.2.1.7, 3.2.1.9, 3.2.1.10, and 3.2.1.14.	No	See DR BIO-2, DR BIO-3, DR BIO-12, and DR BIO-16
Appendix B (g) (13) (C) (i)	A list of sensitive species and habitats with a potential to occur (defined in (A) above) and include status (state, federal, California Native Plant Society, global rank, state rank, etc.)	Appendix 3.2B; Subsections 3.2.1.9 and 3.2.1.10	No	See DR-BIO-16 and DR BIO-20

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Technical Area: Biological Resources

Project: Prairie Song Reliability Project

Technical Staff: Wood

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (13) (C) (iii)	Perform nitrogen deposition modeling including the complete citation for references used in determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.	Subsection 3.2.1.6	Yes	
Appendix B (g) (13) (D)	A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDDB records and field survey forms completed by the applicant's biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include:	Subsection 3.2.1.5, p. 3.2-8 through 3.2-11; Appendix 3.2A; Appendix 3.2C	No	See DR BIO-26. See also DR BIO-1, BIO-3, DR BIO-4, and DR BIO-23
Appendix B (g) (13) (D) (i)	Current biological resources surveys conducted using appropriate field survey protocols (include references) during the appropriate season(s). State and federal agencies with jurisdiction shall be		No	See DR BIO-2 through DR BIO-4

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Technical Area: Biological Resources
Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
Docket: 25-OPT-02

Technical Staff: Wood
Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	consulted for field survey protocol guidance prior to surveys if a protocol exists.			
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.	Table 3.2-1, Appendix 3.2-A (entire volume), Appendix 3.2-D (entire volume)	No	See DR BIO-7 through DR BIO-12
Appendix B (g) (13) (E))	Impacts discussion of all impacts (direct, indirect, and cumulative) to biological resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Discussion shall also address sensitive species habitat impacts from air emissions (i.e., nitrogen deposition);	Sections 3.2.2 and 3.2.3	Yes	
Appendix B (g) (13) (F)	A discussion of all feasible mitigation measures and an evaluation of their	Section 3.2.4	No	See DR BIO-27 through DR BIO-29

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0

Date: August 2025
C. Watson/A. Single/C.
Huntley/J. Miner/J.

Technical Area: Biological Resources
Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
Docket: 25-OPT-02

Technical Staff: Wood
Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	anticipated efficacy in reducing the level of impacts, including, but not limited to the following:			
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Section 3.2.4	Yes	
Appendix B (g) (13) (F) (ii)	All off-site habitat mitigation such as habitat improvement or compensation including management, and an identification of appropriate agency contacts for coordination and verification of proposed habitat mitigation measures.	Subsection 3.2.4, p. 3.2-43 through 3.2-46	No	See DR BIO-30
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	Subsection 3.2.4.1	Yes	
Appendix B (g) (13) (G)	A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project.	Section 3.2.4	Yes	
Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S.	N/A	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0

Date: August 2025
C. Watson/A. Single/C.
Huntley/J. Miner/J.

Technical Area: Biological Resources

Project: Prairie Song Reliability Project

Technical Staff: Wood

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 3.2-11	No	See DR BIO-21
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.		No	See DR BIO-31
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within	Table 3.2-13, p. 3.2-61	No	See DR BIO-32 and DR BIO-33

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0

Date: August 2025
C. Watson/A. Single/C.
Huntley/J. Miner/J.

Technical Area: **Biological Resources**

Project: Prairie Song Reliability Project

Technical Staff: Wood

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 2.2.6, page 3.2-61	No	See DR BIO-10 and DR BIO-34

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A), 1877(a)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 3.3.2 p. 3.3-9; section 3.3.1 p. 3.3-20; section 3.3.3.2 pp. 3.3-20-22; Appendix 3.3A pp. 29-34.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.3.2 p. 3.3-9; section 3.3.1 p. 3.3-20; section 3.3.3.2 pp. 3.3-20-22; Appendix 3.3A pp. 29-34.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Appendix 3.3A pp. 37-39.	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Section 3.3 pp. 3.3-1 to 3.3-2; Section 3.3.3 pp. 3.3-20 to 3.3-29.	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features, areas, places, records, sacred places, cultural landscapes, or manuscripts, all of which may have significance according to criteria outlined in sections 21074 and 21084.2 of the Public Resources Code.	---	--	--
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location. This regional summary must address the potential for buried cultural resources and tribal cultural resources to occur in the project area. The summary, together with literature search results, must inform the field methods employed for identifying cultural resources and tribal cultural resources in the project area.	Section 3.3.1 pp. 3.3-3 to 3.3-9; Appendix 3.3A pp. 21-27.	No	See DR CUL/TRI -1
Appendix B (g) (2) (B)	The results of a literature search to identify cultural resources and tribal cultural resources within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources or tribal cultural resources listed pursuant to	Section 3.3.2 pp. 3.3-9 to 3.3-15; Appendix 3.3A pp. 37-45, appendix B and E. Appendix 3.3B pp. 43-45, Appendix B.	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Cultural Resources and Tribal Cultural Resources** Revision No. 0 Date: August 2025

Technical Area: **Tribal Cultural Resources** Project: Prairie Song Reliability Project Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources and tribal cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed.</p> <p>Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR §4853) shall be provided for all cultural resources and tribal cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project</p>			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.			
Appendix B (g) (2) (C)	<p>The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources and tribal cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed.</p> <p>New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes.</p> <p>New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5</p>	Subsection 3.3.2, pp. 3.3-16 to 3.3-20; Appendix 3.3A, pp. 47 to 53. Appendix 3.3B, Appendix B.	Yes	

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Revision No. 0 Date: August 2025

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel's distance from all proposed plant site boundaries. New historic architecture field reconnaissance ("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age.</p> <p>A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if archaeological resource or other sensitive resource locations are included).</p> <p>Information included in the technical report shall also be provided in the application, other sensitive resources, or</p>			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0

Date: August 2025

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>areas of religious significance) shall be submitted under a request for confidentiality pursuant to California Code of Regulations, title 20, section 2501 et seq.</p> <p>At a minimum, the technical report shall include:</p>			
Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	Appendix 3.3A, pp. 21 to 27, 37 to 45; Appendix 3.3B pp.43 to 45.	No	See DR CUL/TRI-1
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural and tribal cultural resources and a discussion of the cultural and tribal resources identified by the survey;	Appendix 3.3A, pp. 33 to 53; Appendix 3.3B, p. 21.	Yes	
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource or tribal cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	Appendix 3.3A-Appendix E. Appendix 3.3B-Appendix B.	No	See DR CUL/TRI-2
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Appendix 3.3A-Appendix C.	No	See DR CUL/TRI-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0

Date: August 2025

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for literature searches, surveys, and preparation of the technical report.	Appendix 3.3A-Appendix A. Appendix 3.3B-Appendix A.	Yes	
Appendix B (g) (2) (D) (i)	A copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC.	Appendix 3.3A-Appendix D.	Yes	
Appendix B (g) (2) (D) (ii)	A copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.	Appendix 3.3A-Appendix D.	Yes	
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	Subsection 3.3.2.3, p. 3.3-16; Appendix 3.3A, p. 46	Yes	
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	--	--	--
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	Subsection 3.3.5, pp. 3.3-27 to 3.3-29; Appendix 3.3A, pp. 61 to 64.	Yes	
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural and tribal cultural resources and any unanticipated impacts	Subsection 3.3.5, pp. 3.3-27 to 3.3-29; Appendix 3.3A, pp. 61 to 64; Appendix 3.3B, p. 55.	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: August 2025

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to known cultural or tribal cultural resources; and			
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.	Subsection 3.3.5, p. 3.3-27; Appendix 3.3A, p. 62.	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.3.6, pp. 3.3-29 to 3.3-31.	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.3.8, p. 3.3-37	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within	Subsection 3.3.7, p. 3.3-36; Appendix 3.3A, p. 64	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Prairie Song Reliability Project

Technical Staff: W. Larson, C. Travis

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.3.8, p. 3.3-37.	Yes	

**DATA COMPLETENESS
WORKSHEET**

Completeness: Complete **X** Incomplete Revision No. 0 Date: August 2025

Technical Area: **Efficiency, Energy and Energy Resources** Project: Prairie Song Reliability Project Technical Staff: Jacob Locsin

Project Manager: Lisa Worrall : 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	N/A	N/A	N/A
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	N/A	N/A	N/A
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	Subsection 2.5, pp. 2-24	Yes	
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	Subsection 2.5, pp. 2-24	Yes	

**DATA COMPLETENESS
WORKSHEET**

Completeness: Complete **X** Incomplete Revision No. 0 Date: August 2025

Technical Area: **Efficiency, Energy and Energy Resources** Project: Prairie Song Reliability Project Technical Staff: Jacob Locsin

Project Manager: Lisa Worrall : 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance with applicable efficiency and operating standards.	N/A	N/A	N/A
Appendix B (h) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	Subsection 4.5.2, pp. 4-7 through 4-19	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies	N/A	N/A	N/A

**DATA COMPLETENESS
WORKSHEET**

Completeness: Complete **X** Incomplete Revision No. 0 Date: August 2025

Technical Area: **Efficiency, Energy and Energy Resources** Project: Prairie Song Reliability Project Technical Staff: Jacob Locsin

Project Manager: Lisa Worrall : 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐

Revision No. 0 Date: August 2025

Technical Area: **Executive Summary**

Project: Prairie Song Reliability Project

Technical Staff: Lisa Worrall

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Section 3.1 to 3.17; Section 4 through 8	Yes	
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics.	Subsection 1.1 to 1.2, Table 1-1, pp.1-1 through 1.6	Yes	
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county, and assessor's parcel numbers.	Section 1, Table 1-1, pp. 1-1 through 1.3	Yes	
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	Section 1, pp. 1-1 through 1-3, Figure 1-1 through 1-3, pp. 1-15, 1-17, 1-19	Yes	
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	Section 1, Figure 1-4, 1-5a, and 1-5b, pp. 1-21, 1-23, 1-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐

Revision No. 0 Date: August 2025

Technical Area: Executive Summary

Project: Prairie Song Reliability Project

Technical Staff: Lisa Worrall

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities. Provide the direct mailing addresses for the owners and occupants of properties contiguous to the proposed power plant, related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. Provide a map showing the parcels in the notice area.	Appendix 1A (confidential), Table A, pp. 1A-1 through 1A-9	Yes	
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	Subsection 1.3, p. 1-6	Yes	
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	Subsection 1-4, p. 1-7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete
Revision No. 0 Date: August 2025
 Technical Area: **Executive Summary**
Project: Prairie Song Reliability Project
 Project Manager: Lisa Worrall
Docket: 25-OPT-02
Technical Staff: Lisa Worrall
Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	Subsection 1-4, p. 1-7	Yes	
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in (a)(3)(A) and (B).	Subsection 1-4, p. 1-7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Facility Design**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Ardalan Raisi Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (1) (A)	A description of the site conditions and investigations or studies conducted to determine the site conditions used as the basis for developing design criteria. The descriptions shall include, but not be limited to, seismic and other geologic hazards, adverse conditions that could affect the project's foundation, adverse meteorological and climatic conditions, and flooding hazards, if applicable.	Section 2.1, pp. 2-1 to 2-2; Subsection 2.3.1, pp. 2-3 to 2-4; Section 3.4, pp. 3.4-1 to 3.4-28; Subsection 3.15.1.5, pp. 3.15-7; Appendix 3.4A; Appendix 3.15A	Yes	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Subsection 2.4.3, pp. 2-19 to 2-20; Subsection 2.4.4, p 2-20; Appendix 3.4A;	Yes	
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation),	Subsection 2.4.3, pp. 2-19 to 2-20; Subsection 2.4.4,	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Facility Design**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Ardalan Raisi Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	analytical techniques, assumptions, loading conditions, and loading combinations to be used in the design of facility structures and major mechanical and electrical equipment.	p 2-20; Subsection 2.4.5, pp. 2-20 to 2-21; Subsection 2.4.6, p. 2-21; Subsection 3.4.1, pp. 3.4-2 to 3.4-9		
Appendix B (h) (1) (D)	For each of the following facilities or systems, provide a description including drawings, dimensions, surface-area requirements, typical operating data, and performance and design criteria for protection from impacts due to adverse site conditions:	Subsection 3.4.1, pp. 3.4-2 to 3.4-6; Subsection 3.4.2, pp. 3.4-6 to 3.4-9	Yes	
Appendix B (h) (1) (D) (i)	The power generation system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (ii)	The heat dissipation system;	Subsection 2.3.1, pp. 2-3 to 2-8; Subsection 3.7.4, p. 3.7-12	Yes	
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	N/A	N/A	N/A
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Subsection 2.4.10, pp. 2-22 to 2-23; Subsection 2.4.11, p. 2-23; Subsection 2.4.12, p. 2-23; Subsection 2.5.1, p. 2-24; Subsection 2.5.2, p. 2-25; Subsection 2.5.3, p. 2-25; Subsection 3.14, pp. 3.14-1 to 3.14-17	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Facility Design**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Ardalan Raisi Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	Subsection 3.7.2.3.1, pp. 3.7-12 to 3.7-14; Figure 3.7-2, p. 3.7-31; Subsection 3.7.4, pp. 3.7-17 to 3.7-18	Yes	
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	N/A	N/A	N/A
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	Subsection 2.3.1.2, p. 2-5; Subsection 2.3.1.3, p. 2-5; Subsection 2.3.1.4, p. 2-6; Subsection 2.3.2.4, p. 2-13	Yes	
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	Subsection 2.3.1.5, p. 2-6; Subsection 2.3.1.6, p. 2-6; Subsection 2.3.1.7, p. 2-6; Subsection 2.3.1.8, p. 2-7; Subsection 2.3.1.9, pp. 2-7 to 2-8; Subsection 2.3.1.10, p. 2-8; Subsection 2.3.1.11, pp. 2-8 to 2-9; Subsection 2.3.2.3, pp. 2-11 to 2-13	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard	Table 3.5-3, pp. 3.5-18 to 3.5-22; Table 3.10-16, pp. 3.10-22 to 3.10-24; Table 3.13-6, p. 3.13-23; Table 3.17-5, pp. 3.17-22 to 3.17-23	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Facility Design**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Ardalan Raisi Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 3.5-4, pp. 3.5-27 to 3.5-28; Table 3.6-3, pp. 3.6-32 to 3.6-33; Table 3.11-3, p. 3.11-12; Table 3.15-4, p. 3.15-26; Table 3.17-6, p. 3.17-24	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 3.5-4, pp. 3.5-27 to 3.5-28; Table 3.6-3, pp. 3.6-32 to 3.6-33; Table 3.11-3, p. 3.11-12; Table 3.15-4, p. 3.15-26; Table 3.17-6, p. 3.17-24	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: Geological Hazards Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin Delano

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.4.1 p. 3.4-2 through 3.4-6; 3.4.2 p. 3.4-6 through 3.4-9; Appendix 3.4A p. 5 to 13	No	See DR GEO-1 to DR GEO-3
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.4.2 p. 3.4-6 through 3.4-9; Appendix 3.4A pp. 5 to 13	No	See DR GEO-3
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.4.8, p. 3.4-17	No	See DR GEO-3
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts	Section 3.4.1.4, p. 3.4-44; Section 3.4.2, pp. 3.4-6 through 3.4-9; Appendix 3.4A	Yes	

DATA COMPLETENESS WORKSHEET

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Revision No. 0 Date: August 2025

Technical Area: Geological Hazards Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin Delano

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	Section 3.4.1.2 p 3.4-2; 3.4.1.2 p 3.4-4; Section 3.4.1.1, pp. 3.4-2 through 3.4-6	Yes	
Appendix B (g) (17) (B)	A map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. Include an analysis of the likelihood of ground rupture, seismic shaking, mass wasting and slope stability, liquefaction, subsidence, tsunami	Figure 3.4-1 p. 3.4-19; Figure 3.4-2, p. 3.4-21; Figure 3.4-4, p. 3.4-25; Figure 3.4-5, p. 3.4-27; Section 3.4.1, pp. 3.4-2 through 3.4-6; Section 3.4.2, pp. 3.4-6 through 3.4-10; Appendix 3.4A, p. 4-12	No	See DR GEO-1 and DR GEO-2

DATA COMPLETENESS WORKSHEET

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Revision No. 0 Date: August 2025

Technical Area: Geological Hazards Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin Delano

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	runup, and expansion or collapse of soil structures at the plant site. Describe known geologic hazards along or crossing linear facilities.			
Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.	Section 3.4.2.3.4 and 3.4.2.3.5, p. 3.4-9; Figure 3.4-5, p. 3.4-26	No	See DR GEO-3
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 3.4-2, pp. 3.4-10 through 3.4-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: Geological Hazards Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin Delano

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Table 3.4-3, p. 3.4-17	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 3.4-3, p. 3.4-17	No	See DR GEO-4
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.4.7, p. 3.4-17	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Hazardous Materials

Technical Area: **Handling**

Project: Prairie Song Reliability Project

Technical Staff: Paul Miller

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.5.2.1, p. 3.5-9	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.5.1.1, pp. 3.5-2 to 3.5-3; Subsections 3.5.2.1 to 3.5.2.2, pp. 3.5-9 to 3.5-10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.5, p. 3.5-1; Subsection 3.5.8, p. 3.5-28 through 3.5-29	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Subsection 3.5.1; Subsections 3.5.2 to 3.5.5	No	See DR HAZ-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Hazardous Materials

Technical Area: **Handling**

Project: Prairie Song Reliability Project

Technical Staff: Paul Miller

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.	Subsection 3.5.1.2, pp. 3.5-5 through 3.5-6; Table 3.5-2, pp. 3.5-7 through 3.5-9	Yes	
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	Figures 3.5-1-1 to Figure 3.5-1-5, pp. 3.5-31 through 3.5-39	Yes	
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Subsection 3.5.1.2, pp. 3.5-5 through 3.5-6; Table 3.5-2, pp. 3.5-7 through 3.5-9	Yes	
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases that could result in off site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the application is complete.	Appendix 3.5B	Yes	
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) will be required, and if so, the requirements that will likely be incorporated into the plan.	Subsection 3.5.2.3, p. 3.5-13; Subsection 3.5.5.2, p. 3.5-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Hazardous Materials

Technical Area: **Handling**

Project: Prairie Song Reliability Project

Technical Staff: Paul Miller

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Subsection 3.5.2.3, pp. 3.5-10 through 3.5-15; Appendix 3.5C, pp. 16 to 17	Yes	
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	Subsection 3.5.2.3, pp. 3.5-13 through 3.5-14; Section 1, Figure 1-3, p. 1-19; Subsection 3.17.2.4, pp. 3.17-20 through 3.17-21; Subsection 3.16.2.3.2, pp. 3.16-11 through 3.6-16	No	See DR HAZ-2 to DR HAZ-4
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 3.5-3, pp. 3.5-18 through 3.5-22	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement	Table 3.5-4, pp. 3.5-27 through 3.5-28	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Hazardous Materials

Technical Area: **Handling**

Project: Prairie Song Reliability Project

Technical Staff: Paul Miller

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 3.5-4, pp. 3.5-27 through 3.5-28; Appendix 3.5C Table 4, p. 14	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.5.6, p. 3.5-28	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: Land Use Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.6.2.1, p. 3.6-4	No	See DR LAND-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.6.2.1, p. 3.6-4; Subsection 3.6.9, pp. 3.6-33 through 3.6-34	No	See DR LAND-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.6.8, pp. 3.6-33 through 3.6-34	No	See DR LAND-1
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any	Subsection 3.6.1, pp. 3.6-2-3.6-4; Subsection 3.6.2, pp. 3.6-4 through 3.6-24; Subsection 3.6.3, pp. 3.6-24 to 3.6-25; Subsection 3.6.4, p. 3.6-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025

Technical Area: **Land Use** Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (3) (A)	A discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	Subsection 3.6.1.3, p. 3.6-3; Subsection 3.6.1.4, p. 3.6-3; Figure 3.6-3, p. 3.6-39; Figure 3.6-4, p. 3.6-41	No	See DR LAND-1
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	Subsection 3.6.1.1, p. 3.6-2; Subsection 3.6.1.2, pp. 3.6-2 through 3.6-3; Subsection 3.6.1.3, p. 3.6-3; Subsection 3.6.1.4, p. 3.6-3; Figure 3.6-3, p. 3.6-39	No	See DR-LAND 1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: Land Use

Project: Prairie Song Reliability Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (3) (A) (ii)	A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level;	Section 3.6, pp. 3.6-1 through 3.6-34	No	See DR LAND-2
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	Subsection 3.6.2.3, p. 3.6-23	Yes	
Appendix B (g) (3) (A) (iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.	Section 3.6, Figure 3.6-3 and Figure 3.6-4, pp. 3.6-39 through 3.6-41	No	See DR LAND-3
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state,	Subsection 3.6.2.3, pp. 3.6-5 through 3.6-23	No	See DR LAND-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: Land Use Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations.			
Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging	Subsection 3.6.7, p. 3.6-33	No	See DR LAND-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025

Technical Area: Land Use Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	area, will be located on a single legal parcel. The merger need not occur prior to a decision on the Application but must be completed prior to the start of construction.			
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	Subsection 3.6.1.4, pp. 3.6-3 to 3.6-4; Subsection 3.6.2.3, pp. 3.6-23 to 3.6-24; Figure 3.6-5, p. 3.6-43	Yes	
Appendix B (g) (3) (D) (i)	Land classifications as shown on the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland maps, crop types, irrigation systems, and any special cultivation practices;	Subsection 3.6.1.4, pp. 3.6-3 through 3.6-4; Subsection 3.6.2.3, pp. 3.6-23 through 3.6-24; Figure 3.6-5, p. 3.6-43	Yes	
Appendix B (g) (3) (D) (ii)	Whether agricultural land affected by the project was historically classified Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and	Subsection 3.6.1.4, p. 3.6-3; Subsection 3.6.2.3.3, p. 3.6-23	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete X Revision No. 0 Date: August 2025
 Technical Area: Land Use Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.	Subsection 3.6.1.4, p. 3.6-4; Subsection 3.6.2.3.3, p. 3.6-23; Subsection 3.6.3, p. 3.6-24	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.6.5, pp. 3.6-25 through 3.6-31	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and	Subsection 3.6.6, Table 3.6-3, pp. 3.6-32 through 3.6-33	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete X Revision No. 0 Date: August 2025

Technical Area: Land Use Project: Prairie Song Reliability Project Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.6.6, Table 3.6-3, pp. 3.6-32 through 3.6-33	No	See DR LAND-5
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.6.6, Table 3.6-3, pp. 3.6-32 through 3.6-33	No	See DR LAND-5

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete
 Technical Area: **Noise** Project: Prairie Song Reliability Project
 Project Manager: Lisa Worrall Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Ardalan Raisi Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.7.1, pp. 3.7-2 through 3.7-6; Subsection 3.7.2.3.1, p. 3.7-8; Subsection 3.7.2.3.2, p. 3.7-15; Appendix 3.7B; Appendix 3.7C; Appendix 3.7D	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.7.1, pp. 3.7-2 through 3.7-6; Subsection 3.7.2.2, pp 3.7-6 through 3.7-7	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.7.1, pp. 3.7-2 to 3.7-6; Subsection 3.7.2.3.1, p. 3.7-8; Subsection 3.7.2.3.2, p. 3.7-15; Subsection 3.7.8, pp. 3.7-26 to 3.7-27	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the	Subsection 3.7.1, pp. 3.7-2 through 3.7-6; Subsection 3.7.2.3, pp. 3.7-8 through 3.7-16; Subsection 3.7.3, p. 3.7-16 through 3.7-17	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: August 2025
 Technical Area: Noise Project: Prairie Song Reliability Project Technical Staff: Ardalan Raisi Sofi
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (4) (A)	A land use map which identifies residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either construction or operation, there is a potential increase of 5 dB(A) or more, over existing background levels.	Figure 3.7-1, p. 3.7-29	Yes	
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions,	Subsection 3.7.1.9, pp. 3.7-5 through 3.7-6; Appendix 3.7A	Yes	

DATA COMPLETENESS WORKSHEET

Completeness:	Complete <input checked="" type="checkbox"/> Incomplete <input type="checkbox"/>		Revision No. <u>0</u> Date: <u>August 2025</u>
Technical Area:	Noise	Project: <u>Prairie Song Reliability Project</u>	Technical Staff: <u>Ardalan Raisi Sofi</u>
Project Manager:	<u>Lisa Worrall</u>	Docket: <u>25-OPT-02</u>	Technical Senior: <u>Shahab Khoshmashrab</u>

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	including temperature, humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L ₁₀ , L ₅₀ , and L ₉₀ values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) shall also be reported in units of dB(A).			
Appendix B (g) (4) (C)	A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.	Subsection 3.7.2.3.1, pp. 3.7-8 through 3.7-14; Appendix 3.7D	Yes	
Appendix B (g) (4) (D)	An estimate of the project noise levels, during both construction and operation, at residences, hospitals,	Subsection 3.7.2.3.1, pp. 3.7-8 through 3.7-14;	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: August 2025
 Technical Area: Noise Project: Prairie Song Reliability Project Technical Staff: Ardalan Raisi Sofi
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	libraries, schools, places of worship or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.	Appendix 3.7B; Figure 3.7-2, p. 3.7-31		
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	Subsection 3.7.2.3.1, pp. 3.7-8 through 3.7-14; Figure 3.7-2, p. 3.7-31	Yes	
Appendix B (g) (4) (F)	The audible noise from existing switchyards and overhead transmission lines that would be affected by the project and estimates of the future audible noise levels that would result from existing and proposed switchyards and transmission lines. Noise levels shall be calculated at the property boundary for switchyards and at the edge of the rights-of-way for transmission lines.	Subsection 3.7.2.3.1, p. 3.7-14; Appendix 2D; Appendix 2E	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall	Table 3.7-11, pp. 3.7-18 through 3.7-20	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete Revision No. 0 Date: August 2025
 Technical Area: **Noise** Project: Prairie Song Reliability Project Technical Staff: Ardalan Raisi Sofi
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.7.6, p. 3.7-26	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.7.6, p. 3.7-26	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.7.7, p. 3.7-26	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. ____ Date: August 2024

Technical Area: **Paleontological Resources**
Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
Docket: 25-OPT-02

Technical Staff: Nick Kehrlein, Kevin Delano
Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.8.2 p. 3.8-2 through 3.8-5; Appendix 3.8A (confidential);	No	See DR PALEO-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.8.2, pp. 3.8-2 through 3.8-5; Appendix 3.8A (confidential)	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.8.8, p. 3.8-8	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Subsection 3.8.2 to 3.8.4, pp. 3.8-2 through 3.8-6	No	See DR PALEO-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. ____ Date: August 2024

Technical Area: **Paleontological Resources**

Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin Delano

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting, formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.	Subsection 3.4.1.1 through 3.4.1.2 p. 3.4-2; Subsection 3.8.1.1 p. 3.8-1	Yes	
Appendix B (g) (16) (B)	A discussion of the sensitivity of the project area described in subsection (g)(16)(A) and the presence and significance of any known paleontological localities or other paleontological resources within or adjacent to the project. Include a discussion of sensitivity for each geologic unit identified on the most recent geologic map at a scale of 1:24,000. Provide rationale as to why the sensitivity was assigned.	Subsection 3.8.1.1 through 3.8.2.1 p. 3.8-2; Subsection 3.8.2.1.1 p. 3.8-3; Subsection 3.8.2.3.1 p. 3.8-4 to 3.8-5; Figure 3.4-1 p. 3.4-19	No	See DR PALEO-1
Appendix B (g) (16) (C)	A summary of all local museums, literature searches and field surveys used to provide information about paleontological resources in the project area described in (g)(16)(A). Identify the dates of the surveys, methods used in completing the surveys, and the names and qualifications of the individuals conducting the surveys.	Subsection 3.8.2.1 p. 3.8-2; Subsection 3.8.2.1.1 p. 3.8-3 through 3.8-4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. ____ Date: August 2024

Technical Area: **Paleontological Resources**
Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
Docket: 25-OPT-02

Technical Staff: Nick Kehrlein, Kevin Delano
Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey reports, locality records, and maps at a scale of 1:24,000, showing occurrences of fossil finds, if known, within a 1-mile radius of the project and related facilities shall be included in a separate appendix to the Application and submitted to the Commission under a request for confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.	Figure 3.8-1 p. 3.8-11; Appendix 3.8A (confidential)	No	See DR PALEO-2
Appendix B (g) (16) (E)	A discussion of any educational programs proposed to enhance awareness of potential impacts to paleontological resources by employees, measures proposed for mitigation of impacts to known palaeontologic resources, and a set of contingency measures for mitigation of potential impacts to unknown paleontological resources.	Subsection 3.8.3 through 3.8.4 p. 3.8-5	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application	Subsection 3.8.5, Table 3.8-p. 3.8-6	Yes	

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Revision No. ____ Date: August 2024

Technical Area: **Paleontological Resources**
Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
Docket: 25-OPT-02

Technical Staff: Nick Kehrlein, Kevin Delano
Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.8.6, Table 3.8-3 p. 3.8-8	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.8.6, Table 3.8-3 p. 3.8-8	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.8.7 p. 3.8-8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness:	Complete <input type="checkbox"/> Incomplete <input checked="" type="checkbox"/>	Revision No. <u>0</u>	Date: <u>August 2025</u>
Technical Area:	Project Description	Project: <u>Prairie Song Reliability Project</u>	Technical Staff: <u>Various</u>
Project Manager:	<u>Lisa Worrall</u>	Docket: <u>25-OPT-02</u>	Technical Senior: <u>Kaycee Chang</u>

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide:	--	--	--
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	Figure 2-1, p. 2-29	Yes	
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities to establish the accuracy of the photo simulations required in sections (a)(1)(D) and (g)(6)(F);	Appendix 2A	Yes	
Appendix B (b) (1) (C)	A detailed description of the design, methods of construction (include depth of excavations and other ground disturbances) and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	Subsection 2.3-1 to 2.3-2 pp. 2-3 through 2-13, Table 2-1 to Table 2-4; Subsection 2.4 to 2.5, Table 2-7, Table 2-8, pp. 2-17 through 2-25	No	See DR CUL/TRI-4 ,DR PD-1, DR WS-7 and DR WS-13
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected, and the consideration given to engineering	Subsection 2.7, pp. 2-25 through 2-26	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Various
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and other factors considered by the applicant.			
Appendix B (b) (2)	In a section titled, "Transmission Lines Description, Design, and Operation" provide:	-	--	--
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	Figure 2-2	Yes	
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.	Figure 1-4, 1-5a, and 1-5b	Yes	
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include	Subsection 2.1 to 2.3 p. 2-1 to 2-4; Subsection 2.3.1.4, p. 2-6	No	See DR TSD-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Various
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.			
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints; and	Subsection 2.3.2, pp. 2-9 to 2-11	No	See DR TSD-2 See DR TSD-3 See DR TSD-4
Appendix B (b) (2) (E)	A completed System Impact Study or signed System Impact Study Agreement with the California Independent System Operator and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact Study agreement and proof of payment to the interconnecting utility. If the interconnection and operation of the proposed project will likely impact a transmission system that is not controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when applicable) with/to the impacted transmission owner or provide evidence	Section 2, Appendix 2C	No	See DR TSD-5

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Various
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	that there are no system impacts requiring mitigation.			
Appendix B (b) (3)	Applications for geothermal facilities shall contain the following additional information:	N/A	N/A	N/A
Appendix B (b) (3) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) showing the location of the geothermal leaseholds, along with a description by section, township, range, county, and assessor's parcel numbers of the leaseholds;	N/A	N/A	N/A
Appendix B (b) (3) (B)	Full-page color photographic reproductions of the geothermal leaseholds;	N/A	N/A	N/A
Appendix B (b) (3) (C)	A description of the process by which the geothermal leasehold was selected and the consideration given to engineering constraints, site geology, environmental impacts, water, steam, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant. Include references to any environmental documents which address steam field development;	N/A	N/A	N/A
Appendix B (b) (3) (D)	A detailed description of the type, quality, and characteristics of the geothermal resource, including pressure and temperature flow rates, constituents and concentrations of non-condensable gases,	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project
 Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Various
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and constituent concentrations of dissolved solids, and descriptions and concentrations of any substances potentially harmful to public health and safety or to the environment;			
Appendix B (b) (3) (E)	Proposed locations of production and re-injection wells for the project. Include the applicant's assessment of geothermal resource adequacy, including the production history of those wells within the leaseholds dedicated to the project, including pressure decline curves as available; and	N/A	N/A	N/A
Appendix B (b) (3) (F)	A discussion of the potential impacts on the temperature, mineral content, and rate of flow of thermal springs affected by the project.	N/A	N/A	N/A
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Subsection 2.6, p-2-25; Subsection 3.2.4.2, p-3.2-48; Appendix 2F	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Public Health** Project: Prairie Song Reliability Project Technical Staff: Yifan Ding
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.9.1, pp. 3.9-2 to 3.9-3	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.9.2.2, pp. 3.9-4 to 3.9-9	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.9.8, pp. 3.9-15 to 3.9-17	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any	Subsection 3.9.4, p. 3.9-11; Subsection 3.9.5, pp. 3.9-11 to 3.9-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Public Health** Project: Prairie Song Reliability Project Technical Staff: Yifan Ding
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	Subsection 3.9.3, Table 3.9-4 pp. 3.9-9 to 3.9-10; Subsection 3.9.3, Table 3.9-5 p. 3.9-10	No	See DR PH-1 to DR PH-4
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic	Appendix 3.9A	No	See DR PH-2 and DR PH-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: August 2025

Technical Area: **Public Health**

Project: Prairie Song Reliability Project

Technical Staff: Yifan Ding

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and print formats, used to prepare the HARP health risk assessment.			
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.	Subsection 3.9.2.2, pp. 3.9-4 to 3.9-9	Yes	
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	Figure 3.9-1, p. 3.9-19	Yes	
Appendix B (g) (9) (E)	For this section, the following definitions apply:	--	--	--
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;	Subsection 3.9.1.5, p. 3.9-3	Yes	
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and	Subsection 3.9.2.2.1, pp, 3.9-4 to 3.9-5	No	See DR PH-1 to DR PH-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Public Health** Project: Prairie Song Reliability Project Technical Staff: Yifan Ding
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.	Subsection 3.9.3, Table 3.9-4, pp. 3.9-9 to 3.9-10; Subsection 3.9.3, Table 3.9-5, p. 3.9-10	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.9.6, pp. 3.9-12 to 3.9-15	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive	Subsection 3.9.6, pp. 3.9-12 to 3.9-15	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Public Health** Project: Prairie Song Reliability Project Technical Staff: Yifan Ding
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.9.7, p. 3.9-15	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.9.7, p. 3.9-15	Yes	

DATA COMPLETNESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐
 Technical Area: Reliability Project: Prairie Song Reliability Project Revision No. 0 Date: August 2025
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Staff: Jacob Locsin
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (3) (A)	A discussion of the sources and availability of the fuel or fuels to be used over the estimated service life of the facilities.	N/A	N/A	N/A
Appendix B (h) (3) (B)	A discussion of the anticipated service life and degree of reliability expected to be achieved by the	Subsection 2.5, pp. 2-24	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: August 2025
 Technical Area: Reliability Project: Prairie Song Reliability Project Technical Staff: Jacob Locsin
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	proposed facilities on consideration of:			
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	Subsection 2.5, pp. 2-24	Yes	
Appendix B (h) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;	Subsection 2.5, pp. 2-24	Yes	
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	Subsection 3.4, pp. 3.4-1 through 3.4-17	Yes	
Appendix B (h) (3) (B) (iv)	Special design features adopted by the applicant or resource supplier to ensure power plant reliability including equipment redundancy; and	Subsection 2.3.1.1, pp. 2-4 Subsection 2.3.1.2, pp. 2-5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Reliability** Project: Prairie Song Reliability Project
 Project Manager: Lisa Worrall Docket: 25-OPT-02

Revision No. 0 Date: August 2025
 Technical Staff: Jacob Locsin
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	N/A	N/A	N/A
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans,	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐
 Technical Area: Reliability Project: Prairie Song Reliability Project Revision No. 0 Date: August 2025
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Staff: Jacob Locsin
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Socioeconomics Project: Prairie Song Reliability Project Technical Staff: Ellen LeFevre
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.10.2, pp. 3.10-11 to 3.10-14; Appendix A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.10.2.2 and 3.10.2.3, pp. 3.10-13 to 3.10-14; Appendix A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach,	Subsection 3.2, pp. 3-2 to 3-7; Subsection 3.10.1, p. 3.10-2; Subsection 3.10.2.3, pp. 3.10-17 to 3.10-19; Subsection 3.10.3, p. 3.10-22; Subsection 3.10.4, p. 3.10-22	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Socioeconomics Project: Prairie Song Reliability Project Technical Staff: Ellen LeFevre
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region affected by construction and operation of the project. Include:	--	--	--
Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;	Subsection 3.10.1.3 and 3.10.1.4, pp. 3.10-4 to 3.10-8	Yes	
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	Subsection 3.10.1, pp. 3.10-2 to 3.10-7	Yes	
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	Subsection 3.10.1.3, p. 3.10-5, Table 3.10-6	Yes	
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for construction and operation of the project;	Subsection 3.10.1.3.1, Table 3.10-7, pp. 3.10-5 to 3.10-6	Yes	
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	Subsection 3.10.1.2, p. 3.10-3, Table 3.10-3 and Table 3.10-4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Socioeconomics Project: Prairie Song Reliability Project Technical Staff: Ellen LeFevre
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (7) (A) (vi)	Capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule.	Subsections 3.10.1.5, 3.10.1.6, and 3.10.2.3 pp. 3.10-9 to 3.10-10 and 3.10-20 to 3.10-21	No	See DR SOCIO-1
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note year of estimate, model, if used, and appropriate sources), including:	Subsection 3.10.1.3, p. 3.10-4	Yes	
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number of	Subsection 3.10.2.3, 3.10.2.3, pp. 3.10-13 to 3.10-15, Table 3.10-11, p. 3.10-17, Table 3.10-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Socioeconomics Project: Prairie Song Reliability Project Technical Staff: Ellen LeFevre
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	permanent operations workers during a year;			
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work during the project construction and operation;	Subsection 3.10.2.3.1 and 3.10.2.3.2, p. 3.10-17	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	Subsection 3.10.2.3, p. 3.10-17	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	Subsection 3.10.2.3, p. 3.10-17	Yes	
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information on schools	Subsections 3.10.2.3.5 to 3.10.2.3.7, pp. 3.10-20 to 3.10-2; Subsections 3.10.1.6.1, 3.10.1.6.2, 3.10.1.6.3, pp. 3.10-9 to 3.10-10; Subsection 3.10.2.3.7, p. 3.10-21	No	See DR SOCIO-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Socioeconomics Project: Prairie Song Reliability Project Technical Staff: Ellen LeFevre
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating -phases;			
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	Subsection 3.10.2.3.5, p. 3.10-20	Yes	
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	Subsection 3.10.2.3.4, pp. 3.10-19 to 3.10-20	Yes	
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	Subsection 3.10.2.3.4, pp. 3.10-18 to 3.10-19	Yes	
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	Subsection 3.10.2.3.4, Table 3.10-15, pp. 3.10-18 to 3.10-20	Yes	
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	Subsection 3.10.2.3.4, p. 3.10-19	Yes	
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	Subsection 3.10.2.3.4, p. 3.10-19	Yes	
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment	Subsection 3.10-2.3.3, pp. 3.10-17 to 3.10-18	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Socioeconomics Project: Prairie Song Reliability Project Technical Staff: Ellen LeFevre
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	effects due to construction and operation of the project; and			
Appendix B (g) (7) (B) (xiii)	A discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations.	Subsection 3.10.2.4, pp. 3.10-21 to 3.10-22	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.10.5, pp. 3.10-22 to 3.10-24, Table 3.10-16	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority,	Subsection 3.10.5, Table 3.10-16, pp. 3.10-22 to 3.10-24	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Socioeconomics** Project: Prairie Song Reliability Project Technical Staff: Ellen LeFevre
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.10.6, p. 3.10-26, Table 3.10-17	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.10.7, p. 3.10-27	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: August 2025

Technical Area: **Soils** Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin DeLano, Negar Vahidi,

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Tatiana Inouye
Abdel-Karim Abulaban, Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Appendix 3.4A p. 5 to 14; Subsection 3.11.1, p. 3.11-2 to 3.11-5	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Appendix 3.4A p. 5 to 14; Subsection 3.11.1, p. 3.11-2 to 3.11-5;	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.11.8, p. 3.11-13	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts	Subsection 3.11.1, 3.11.2, 3.11.3 and 3.11.4, pp. 3.11-2 to 3.11-9	No	See DR SOILS-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: August 2025

Technical Area: **Soils** Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin DeLano, Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban, Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (15) (A)	A map at a scale of 1:24,000 and written description of soil types and all agricultural land uses that will be affected by the proposed project. The description shall include:	Subsection 3.6.1, pp. 3.6-3 to 3.6-4; Subsection 3.11.1, p. 3.11-3; Figure 3.6-3, p. 3.6-39; Figure 3.11-1, p. 3.11-15	No	See DR LAND-3
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;	Subsection 3.11.1.1, p. 3.11-3; Subsection 3.11.1.2, pp. 3.11-3 to 3.11-4	Yes	
Appendix B (g) (15) (A) (ii)	An identification of other physical and chemical characteristics of the soil necessary to allow an evaluation of soil erodibility,	Subsection 3.11.1.1, p. 3.11-3; Subsection 3.11.1.2, pp. 3.11-3 to 3.11-4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: August 2025

Technical Area: **Soils** Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin DeLano, Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban, Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	permeability, re-vegetation potential, and cycling of pollutants in the soil-vegetation system;			
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and	Subsection 3.5.3.1, p. 3.5-16 to 3.5-17	Yes	
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	Subsection 3.5.2.3.2, p. 3.5-14	Yes	
Appendix B (g) (15) (B)	An assessment of the effects of the proposed project on soil resources and agricultural land uses. This discussion shall include:	Subsection 3.6.2, pp. 3.6-23 to 3.6-24; Subsection 3.11.2, pp. 3.11-6 to 3.11-8	Yes	
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and	Subsection 3.11.1.2, p. 3.11-3 to 3.11-4	Yes	
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.	Subsection 3.2.2.2, pp. 3.2-25 to 3.2-27	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed	Table 3.11-2, pp. 3.11-9 to 3.11-10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: August 2025

Technical Area: **Soils** Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin DeLano, Negar Vahidi,

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Tatiana Inouye
Abdel-Karim Abulaban, Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 3.11-3, p. 3.11-2	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and	Table 3.11-3, p. 3.11-12	No	See DR SOILS-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: August 2025

Technical Area: **Soils** Project: Prairie Song Reliability Project

Technical Staff: Nick Kehrlein, Kevin DeLano, Negar Vahidi,

Project Manager: Lisa Worrall Docket: 25-OPT-02

Technical Senior: Tatiana Inouye
Abdel-Karim Abulaban, Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.11.7, p. 3.11-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Traffic and Transportation Project: Prairie Song Reliability Project Technical Staff: Steve J Brown
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.12.1 to 3.12.2, pp. 3.12-2 to 3.12-8; Appendix 3.12A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.12.2 to 3.12.2.3, pp. 3.12-5 to 3.12-25; Appendix 3.12A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.12.8, p. 3.12-36 to 3.12-37	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify	Subsection 3.12.1 to 3.12.4, pp. 3.12-2 to 3.12-27; Appendix 3.12A	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Traffic and Transportation** Project: Prairie Song Reliability Project Technical Staff: Steve J Brown
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	Subsection 3.12.1, pp. 3.12-2 to 3.12-4, Figures 3.12-1 and 3.12-2; Subsection 3.12.5.3, pp. 3.12-31 to 3.12-35	Yes	
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Traffic and Transportation Project: Prairie Song Reliability Project Technical Staff: Steve J Brown
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include:			
Appendix B (g) (5) (B) (i)	A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities.	N/A	N/A	N/A
Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	N/A	N/A	N/A
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and	N/A	N/A	N/A
Appendix B (g) (5) (B) (iv)	Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.	N/A	N/A	N/A
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	Subsection 3.12.2.3.2, pp. 3.12-12 to 3.2-13	No	See DR TRANS-1
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	Subsection 3.12.2.1, pp. 3.12-5 to 3.12-7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Traffic and Transportation Project: Prairie Song Reliability Project Technical Staff: Steve J Brown
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	Subsection 3.12.2.1, pp. 3.12-6 to 3.12-7	Yes	
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	N/A (due to rural area)	NA	N/A
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	Subsection 3.12.2.1, pp. 3.12-5 to 3.12-7; Subsection 3.12.4, pp. 3.12-26 to 3.12-27; Subsection 3.12.2.3.2, pp. 3.12-12 to 3.2-14; Subsection 3.12.5.3, pp. 3.12-31 to 3.12-33; Appendix 3.12A	Yes	
Appendix B (g) (5) (D)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	Subsection 3.12.1, pp. 3.12-2 to 3.12-5, Figures 3.12-2 and 3.12-3	Yes	
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	Table 3.12.6 and 3.12-8, pp. 3.12-17 to 3.12-18	Yes	
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	Appendix 3.12A	Yes	
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	Subsection 3.12.2.3.6, pp. 3.12-16 to 3.12-20; Appendix 3.12A	No	DR TRANS-2 and DR TRANS-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Traffic and Transportation Project: Prairie Song Reliability Project Technical Staff: Steve J Brown
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	Subsection 3.12.1.5, p. 3.12-4; Subsection 3.12.2.3.7, pp. 3.12-24 to 3.12-25	Yes	
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	Table 3.12-1 p. 3.12-17, Table 3.12-7, Subsection 3.12.2.3.6	Yes	
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.	Subsection 3.12.2.3.3 to 3.12.2.3.4, pp. 3.12-14 to 3.12-15	Yes	
Appendix B (g) (5) (E)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include:	Subsection 3.12.2 to 3.12.4, pp. 3.12-5 to 3.12-27	Yes	
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.	Subsection 3.12.2.3.2, pp. 3.12-12 to 3.12-13; Appendix A Part 1	Yes	
Appendix B (g) (5) (E) (ii)	Description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities.	Subsection 3.12.2.3.3, pp. 3.12-14 to 3.12-15; Subsection 3.12.4, pp. 3.12-26 to 3.12-27	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Traffic and Transportation Project: Prairie Song Reliability Project Technical Staff: Steve J Brown
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (F)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.		No	See DR TRANS-4
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 3.12-13, pp. 3.12-27 to 3.12-29	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and	Table 3.12-14, pp. 3.12-35 to 3.12-36	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
 Technical Area: **Traffic and Transportation** Project: Prairie Song Reliability Project Technical Staff: Steve J Brown
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 3.12-14, pp. 3.12-35 to 3.12-36	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.12.7, p. 3.12-36	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: August 2025

Technical Area: **Transmission System**

Project Manager: **Safety and Nuisance**

Project: Prairie Song Reliability Project

Docket: 25-OPT-02

Technical Staff: Sudath Edirisuriya

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 2.3.2.8, p. 2-15 and 2-16; Appendix 2D; Appendix 2E; Figure 1.1, 1.2, and 1.3	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 2.3.2.8, pp. 2-15 and 2-16; Appendix 2D; Appendix 2E	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Appendix 2D, p. 8; Appendix 2E, p. 16	Yes	
Appendix B (g) (1)	provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any	Subsection 2.1 to 2.3, pp. 2-1 through 2-16; Figure 1.1, 1.2, and 1.3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: August 2025

Technical Area: **Transmission System**

Project Manager: **Safety and Nuisance**

Project: Prairie Song Reliability Project

Technical Staff: Sudath Edirisuriya

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	Subsection 2.3.2.3 – 2.3.2.5, p. 2-11 through 2-14; Appendix 2C	Yes	
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.	Subsection 2.3.2.8, pp. 2-15 through 2-16; Appendix 2D; Appendix 2E; Figure 1.1, 1.2, and 1.3	Yes	
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.	Subsection 2.3.2.7, pp. 2-14 through 2-15, Subsection 2.3.2.8, p. 2-15 through 2-16; Appendix 2D; Appendix 2E	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to	Subsection 2.3.2.7, pp. 2-14 through 2-15; Subsection 2.3.2.8, pp. 2-	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete Revision No. 0 Date: August 2025

Technical Area: **Transmission System** Project: Prairie Song Reliability Project Technical Staff: Sudath Edirisuriya

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	15 through 2-16; Appendix 2D; Appendix 2E		
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 3.6-3, pp. 3.6-31 through 3.6-33, Table 6-1, p. 1	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 3.6-3, pp. 3.6-31 through 3.6-33	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Table 6-1, p. 1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: **Transmission System**

Project Manager: **Design**

Project: Prairie Song Reliability Project

Technical Staff: Laiping Ng

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates); and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (h) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	Section 1, p. 1-5 to 1-6; Section 2, p. 2-1, Subsection 2.3.2, p.2-9	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Transmission System Design**

Technical Area: **Design** Project: Prairie Song Reliability Project Technical Staff: Laiping Ng

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (2) (B)	A discussion of the extent to which the proposed electric transmission facilities have been designed, planned, and routed to meet the transmission requirements created by additional generating facilities planned by the applicant or any other entity.	Subsection 2.3.2, p. 2-9 to 2-11; Figure 1-1, Figure 2-1	Yes	
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	Sections 2.1 to 2.3, p. 2-1 to 2-4; Subsection 2.3.1.4, p. 2-6	No	See DR TSD-1
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource	Subsection 2.3.2, p. 2-9 to 2-11	No	See DR TSD-2 to DR TSD-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Transmission System**
 Technical Area: **Design** Project: Prairie Song Reliability Project Technical Staff: Laiping Ng
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	conveyance constraints, and electric transmission constraints.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 2.3.2.7, Table 2-5, p. 2-14 to 2-15	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A
Appendix B (i) (2)	The name, title, phone number, address (required), and email	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025

Technical Area: Transmission System Design Project: Prairie Song Reliability Project Technical Staff: Laiping Ng

Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: August 2025
 Technical Area: Visual Resources Project: Prairie Song Reliability Project Technical Staff: Mark Hamblin
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.13.2.1, pp. 3.13-3 to 3.13-9.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.13, pp. 3.13-1 to 3.13-2; Subsection 3.13.2, pp. 3.13-3 to 3.13-4; Subsection 3.13.2.4, pp. 3.13-8 to 3.13-23	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.13.8, p. 3.13-28	Yes	
Appendix B (g) (1)	... provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation, and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Subsection 3.13.1.1-2, pp. 3.13-2 to 3.13-3; Subsection 3.13.2.5, pp. 3.13-9 to 3.13-22	Yes	

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	Describe the approach, list or projection (or a combination of) used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (6) (A)	Provide a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity, and along the proposed routes for any aboveground project-related linear facilities. Include:	Subsection 3.13.1.1-2, pp. 3.13-2 to 3.13-3	Yes	
Appendix B (g) (6) (A) (i)	Show on a map(s) (pinpoint) any designated or recognized scenic vista and scenic resource within a five-mile radius of the project and one-mile radius of a project-related linear facility. Include:	Appendix 3.13A, pp. 1 to 5	Yes	
Appendix B (g) (6) (A) (i) a.	Any designated scenic vista and scenic resource in an adopted federal, state, county, or city government planning document, plan, or regulation.	Appendix 3.13A, pp. 1 to 5	Yes	
Appendix B (g) (6) (A) (i) b.	A natural feature or object that is a part of the land, such as a geologic distinguishing characteristic (e.g., laccolith), geomorphologic feature (e.g., gorge), or other terrain	Appendix 3.13A, pp. 1 to 5	Yes	

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	feature (e.g., a water body, open space, or a tree recognized for its aesthetic, botanical and ecological value, or age, rarity, and size).			
Appendix B (g) (6) (A) (i) c.	A man-made feature or object that embodies elements of architecture or engineering design, detail, materials or craftsmanship that represent a significant innovation or is unique, such as the California State Capitol, Golden Gate Bridge, or Hollywood Sign.	Appendix 3.13A, pp. 1 to 5	Yes	
Appendix B (g) (6) (A) (i) d.	Explain does the project eliminate or obstruct the public view (the visible area from a location where the public has a legal and physical right of access to real property) of a scenic vista and scenic resource? Is the project situated so that it changes the visual aspect of a scenic resource by being different or in sharp contrast?	Subsection 3.13.2.5.1, pp. 3.13-9 to 3.13-15	Yes	
Appendix B (g) (6) (A) (ii)	Describe the existing nighttime lighting on the project site and in the vicinity.	Subsection 3.13.2.1, p. 3.13-4	Yes	
Appendix B (g) (6) (B)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within an "urbanized	N/A	N/A	N/A

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 Technical Area: **Visual Resources** Project: Prairie Song Reliability Project Technical Staff: Mark Hamblin
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	area” as defined in Public Resources Code section 21071, explain the project’s conformance with the city/county General Plan, and city municipal code or county government code (e.g., zoning) governing scenic quality.			
Appendix B (g) (6) (C)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within a non-urbanized area provide the following:	Subsection 3.13.2.5.3, pp. 3.13-15 to 3.13-20	Yes	
Appendix B (g) (6) (C) (i)	Show on a map the pinpoint location of the key observation point(s) (KOP) for the project. A KOP is a fixed position in a publicly accessible location where a public view of the project is analyzed and/or evaluated in the landscape. Objects of aesthetic significance are the primary focus in the KOP selection.	Figure 3.13-1, p. 3.13-29.	Yes	
Appendix B (g) (6) (C) (ii)	If an object of aesthetic significance is not in the vicinity of the project, a KOP is to be selected based on importance to stakeholders, visibility, direct public selection, worst-case scenario, or other reason. Explain the reason the KOP	Figure 3.13-2a, pp. 3.13-31 to 3.13-77	Yes	

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	was chosen. At a minimum two KOPs are to be selected.			
Appendix B (g) (6) (C) (iii)	Provide a color photograph(s) showing an actual line of sight at eye level during daytime and clear weather from the KOP to the project site prior to any alteration (existing condition). The photographer at the KOP is to use a standard lens. For each photograph provide the following information: camera type, lens focal length, viewing angle; date and time the photograph was taken, and the distance to the project site.	Figure 3.13-2a, pp. 3.13-31 to 3.13-77	Yes	
Appendix B (g) (6) (C) (iv)	Using the photograph from the KOP provide a spatially accurate and realistically photo manipulated computer simulated image of the project (photo-realistic simulation) one-year after completion of construction (existing condition plus proposed project).	Figure 3.13-2a, pp. 3.13-31 to 3.13-77	Yes	
Appendix B (g) (6) (C) (v)	The KOP photograph and the photo-realistic simulation are to be capable of 11" x 17" color print by a printer capable at a minimum 600 dots per inch output resolution.	Figure 3.13-2a, pp. 3.13-31 to 3.13-77	Yes	

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Appendix B (g) (6) (C) (vi)	Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file.	Figure 3.13-2a, pp. 3.13-31 to 3.13-77	Yes	
Appendix B (g) (6) (D)	Show and describe the project in the landscape.	Figure 3.13-2a, pp. 3.13-31 to 3.13-77; App 2A Project Description Appendices Part 1	Yes	
Appendix B (g) (6) (D) (i)	Provide an 8.5" x 11" sized scaled elevation(s) of project buildings, structures, and major equipment; a table listing their dimensions (height, length, width, diameter).	App 2A Project Description Appendices Part 1	Yes	
Appendix B (g) (6) (D) (ii)	Provide a table and description of the exterior surface treatments and finishes for the buildings, structures, major equipment (e.g., colors, flat and/or textured finishes), and structural materials.	Subsection 3.13.2.2.1, p. 3.13-5	Yes	
Appendix B (g) (6) (D) (iii)	Describe project specific architectural treatment or design technique mitigation unique to the project's siting at the location (e.g., camouflage, disguise, screen), if any.	N/A	N/A	N/A
Appendix B (g) (6) (D) (iv)	Provide a project specific conceptual landscape design plan that conforms with the city municipal code or county government code. Include:	App 2A-B Project Description Appendices Part 2	Yes	

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Appendix B (g) (6) (D) (iv) a.	the type of plant and/or tree species, location, quantity, size, spacing at installation/planting, expected growth rates, and expected heights at one-year, five years, and maturity. Specify irrigation system components and show their locations.	App 2A-B Project Description Appendices Part 2	Yes	
Appendix B (g) (6) (D) (iv) b.	the calculated total pervious surface amount for the project site; include the surface to be replaced, the new surface, and the total area to be landscaped.	App 2A-B Project Description Appendices Part 2	Yes	
Appendix B (g) (6) (D) (v)	Provide a project specific conceptual outdoor lighting control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.	App 2A Project Description Appendices Part 1; App 2A-B Project Description Appendices Part 2	Yes	
Appendix B (g) (6) (D) (v) a.	Provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non cutoff) and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-	App 2A Project Description Appendices Part 1; App 2A-B Project Description Appendices Part 2	Yes	

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 Technical Area: **Visual Resources** Project: Prairie Song Reliability Project Revision No. 0 Date: August 2025
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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	specific luminaires locations on a diagram or elevation.			
Appendix B (g) (6) (D) (v) b.	Describe reflectance, the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment offsite to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object—how bright it shines—depends on the intensity of the light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel).	Subsection 3.13.2.5.4, p. 3.13-21	Yes	
Appendix B (g) (6) (E)	If the project is to use a cooling tower emitting a publicly visible water vapor plume (visible plume) in the atmosphere provide the following information:	N/A	N/A	N/A
Appendix B (g) (6) (E) (i)	Provide the cooling tower's number of fan cells, the fan cell stack height and diameter, the exhaust mass flow rate, heat rejection rate, and exhaust temperature.	N/A	N/A	N/A
Appendix B (g) (6) (E) (ii)	Provide fogging curves specific to the cooling tower's exhaust discharge for at least three ambient air temperature conditions (a low, average, and high temperature condition).	N/A	N/A	N/A

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Appendix B (g) (6) (E) (iii)	Explain if the project's forecasted visible plume emitted in the atmosphere by the cooling tower would eliminate or obstruct an existing public view of a designated or recognized scenic vista, scenic resource, and the existing visual character or quality of public views of the site and its surroundings.	N/A	N/A	N/A
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.13.5, pp. 3.13-22 to 3.13-23	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and	Subsection 3.13.5, pp. 3.13-22 to 3.13-23	Yes	

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	agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.13.6, p. 3.13-27	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.13.7, p. 3.13-27	Yes	

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Revision No. 0 Date: August 2025

Technical Area: **Waste Management**

Project: Prairie Song Reliability Project

Technical Staff: James Ackerman, Paul Miller, Nate Berls

Project

Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Abdel-Karim Abulaban

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Cal. Code Regs., tit. 20, § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.14.2 p.p. 3.14-4 to 3.14-10, Subsection 3.14.3, p.p. 3.14-10 to 3.14-11.	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.14.2, pp. 3.14-4 to 3.14-10, Subsection 3.14.3, pp. 3.14-10 to 3.14-11.	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.14.8, p. 3.14-17.	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify	Subsection 3.14.1, pp. 3.14-1 to 3.14-4, Table 3.14-1, p. 3.14-3, Section 3.14.2 pp. 3.14-4 to 3.14-10, Table 3.14-2, pp. 3.14-5 to 3.14-7, Table 3.14-2, pp. 3.14-8 to 3.14-10, Subsection 3.14.3, pp. 3.14-10 to 3.14-11,,	Yes	

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Project: Prairie Song Reliability Project

Technical Staff: James Ackerman, Paul Miller, Nate Berls

Project

Manager: Lisa Worrall

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	the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Subsection 3.14.4, p. 3.14-11.		
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment (ESA) for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination. The Phase I ESA shall have been completed no earlier than one year prior to the filing of the application.	Appendix 3.5A	Yes	

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.	Table 3.5-2, pp. 3.5-7 to 3.5-9; Table 3.14-2, pp. 3.14-5 to 3.14-7	Yes	
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under California Code of Regulations, Title 23, section 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.	Subsection 3.14.1.2, p. 3.14-2, Table 3.14-1, p. 3.14-3.	Yes	
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site	Subsection 3.14.2.3 p.p. 3.14-5 – 3.14-10.	No	See DR WASTE-1 and DR WASTE-2

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Technical Staff: James Ackerman, Paul Miller, Nate Berls

Project

Manager: Lisa Worrall

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 3.14-4, pp. 3.14-11 to 3.14-12; Subsection 3.14.5, pp. 3.14-11 to 3.14-16.	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 3.14-5, Table 3.14-5, Subsection 3.14-6, p. 3.14-16.	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address	Table 3.14-5, p. 3.14-16.	Yes	

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Project: Prairie Song Reliability Project

Technical Staff: James Ackerman, Paul Miller, Nate Berls

Project

Manager: Lisa Worrall

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	(if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.14-7, p. 3.14-16.	Yes	

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

Docket: 25-OPT-02

DATA ADEQUACY WORKSHEET

Revision No. 0 Date: August 2025

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Technical Senior: Abel-Karim Abulaban

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Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.15, p.p. 3.15-1 – 3.15-27; Appendix 3-2D, Attachments A-E; Appendix 3-2E, p.p. 1- 21, Attachments A-F; Appendix 3-15A, p.p. 17, Attachments C through K; Appendix 3-15B, p.p. 33.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Appendix 3-2D, Attachments A-E; Appendix 3-2E, p.p. 1- 21, Attachments A-F; Appendix 3-15A, p.p. 17, Attachments C through K; Appendix 3-15B, p.p. 33.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.15.7, pp. 3.15-36 through 3.15-27; Appendix 3-15B, p. 31.	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or	Subsection 3.15, pp. 3.15-1 through 3.15-27.	Yes	

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Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

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Technical Senior: Abel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:	--	--	--
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);	Appendix 3-2E, pp. 1-21; Appendix 3-2D, Part 1 pp. A1-A13.	No	See DR WATER-4, DR WATER-7 through DR WATER-11.
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	Subsection 5.15.2.3.1, pp. 3.15-9 through 3.15-10; Subsection 5.15.3, p. 3.15-15, p. 3.15-16.	Yes	
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	Appendix 3-2E, Attachment C Figures 1, 2, 3 and 4, Attachment D, pp. 1 through 18	Yes	
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A	N/A	N/A
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The information shall include a narrative discussion and on maps at a scale of	Subsection 3.15.1, pp. 3.15-2 through 3.15-7; Figures 3.15-1 through 3.15-7, pp. 3.15-29 through 3.15-41; Appendix 3-	Yes	

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

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Technical Staff: James Ackerman

Technical Senior: Abel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:	15A, Attachment J, p.p. 1-7, and Exhibits.		
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Subsection 3.15.1.3.1, pp. 3.15-1 through 3.15-4; Appendix 3-15A, Subsection 3.1.2.2, p. 7; Appendix 3-4A, p. 7; Appendix 3-15B, Section 4.2, pp. 11 through 13, Section 4.2.2 and 4.2.3, pp. 15 through 16, Table 5 and 7, Figure 4	Yes	
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Subsection 3.15.1.4.1, p. 3.15-6, Figure 3.15-7; Appendix 3-2D, Application Form, pp. A1 through A13, Figure 4 – Figure 4/Swale-6, Attachment D, Section 2.4, p. 6, Figure 3 and 4; Appendix 3-2E, Application Form, p. 9 of 21, Attachment C, Figure 4 – Figure 4/Swale-6, Attachment D, Appendix B, pp. 1 through 17; Appendix 3.15A, Attachment J, Exhibit 2; Attachment K, Exhibit 2; Appendix 3.15B, Section 4.1, p. 11, Figure 3	No	See DR WATER-1

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

Docket: 25-OPT-02

DATA ADEQUACY WORKSHEET

Revision No. 0 Date: August 2025

Technical Staff: James Ackerman

Technical Senior: Abel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	Subsection 3.15.1.5, p. 5.15-7, Subsection 3.15.2.3.3, pp. 3.15-13 through 3.15-14, Section 3.15.2.3.4, p. 5.15-14, Subsection 3.15.3, p. 3.15-16, Figure 3.15-7; Appendix 3.15A, Attachment J, Exhibits 7 through 12, Appendix C	No	See DR WATER-1
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	Appendix 3-15A, Attachment H, Attachment J, Appendix C, Attachment K, Appendix F.	Yes	
Appendix B (g) (14) (B) (v)	Groundwater wells within ½ mile if the project will include pumping.	Table 3.15-1, p. 3.15-5; Appendix 3-15B, Table 6, p. 14; Appendix 3-15B, Figure 5, p. 45.	Yes	
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	--	--	--
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	Appendix 3-15B, p.p. 1-13	Yes	
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment. For source waters with seasonal variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of	Subsection 3.15.1.4.2, p. 3.15-6, Table 3.15-2	No	See DR WATER-2

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

Docket: 25-OPT-02

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Revision No. 0 Date: August 2025

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	background material used to create this description (that is, laboratory analysis);			
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	Subsection 3.15.2.3.2, p. 3.15-12; Appendix 3-15B, Section 2, pp. 5 through 7.	No	See DR WATER-3
Appendix B (g) (14) (C) (iv)	A detailed description of all facilities to be used in water conveyance (from primary source to the power plant site), water treatment, and wastewater discharge. Include a water mass balance diagram;	Subsection 2.3.1.10, p. 28; Subsection 3.6.2.3.2, p. 3.6-22; Subsection 3.10.1.7.3, p. 3.10-11; Subsection 3.11.2.3.4, p. 3.11-8; Subsection 3.16.2.3.3, p. 3.16-17	No	See DR WATER-3
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary assurances from the water purveyor to serve the project;	Appendix 3-15B, Appendices A and C.	Yes	
Appendix B (g) (14) (C) (vi)	For all water supplied which necessitates transfers and/or	Subsection 3.15.2.3.2. p. 3.15-12; Subsection	Yes	

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

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Revision No. 0 Date: August 2025

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Technical Senior: Abel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	exchanges at any point, identify all parties and contracts/agreements involved, the primary source for the transfer and/or exchange water (that is, surface water, groundwater), and provide the status of all appropriate agencies' approvals for the proposed use, environmental impact analysis on the specific transfers or exchanges required to obtain the proposed supplies, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agency regulation(s);	3.15.2.3.4. p. 3.15-14; Subsection 3.15.5, pp. 3.15-16 through 3.15- 25; Appendix 3-15B, Section 4.3, pp. 16 through 17; Section 5, pp. 18 through 22; Section 6, p.p. 23 through27; Section 7, p. 29; Appendices A to E.		
Appendix B (g) (14) (C) (vii)	Provide water mass balance and heat balance diagrams for both average and maximum flows that include all process or ancillary water supplies and wastewater streams. Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and	N/A	N/A	N/A
Appendix B (g) (14) (C) (viii)	For all projects which have a discharge, provide a copy of the will-serve letter, permit or contract with the public or private entity that will be accepting the wastewater and contact storm water from the project. The letter, permit or contract, if possible, shall identify the discharge volumes and the chemical	N/A	N/A	N/A

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<p>or physical characteristics under which the wastewater and contact storm water will be accepted.</p> <p>In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.</p>			
Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	--	--	--
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area that may be	Subsection 3.15.1.1, pp. 3.15-2 through 3.15-3; Subsection 3.15.1.2, p. 3.15-3; Subsection 3.15.3, , pp. 3.15-	No	See DR WATER-1

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	affected by the project's construction and operation;	15 through 3.15-16; Appendix 3.15A, Section 3, p.p. 7 through 10; Attachment J, Appendix A, 4 pp.; Attachment K, Site Condition Section, pp. 5 through 6.		
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;	Subsection 3.15.2.3.1, pp. 3.15-9 through 3.15-11; Appendix 3.15A, Section 4, p.p. 11 – 12, Section 5, pp. 15 through 16, Attachment H, pp. 1 through 8, Attachment K, Stormwater Management Practice Section, pp. 10 through 11; Appendix 2A (Drawing No. PSR-CS-004 S001 - S014, PSR-CS-005 S001 & S002, PSR-CS-006 S001, PSR-CS-007 S001 – S006, PSR-CS-008 S001 & S002, PSR-CS-009, PSR-CS-010)	No	See DR WATER-5 and DR WATER-6
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and	Appendix 3.15A, Sections 2- 5, pp. 4 through 16, Attachments D, E, and K.	Yes	
Appendix B (g) (14) (D) (iv)	A copy of applicable regional and local requirements regulating the drainage systems, and a discussion	Section 3.15, pp. 3.15-16 through 3.15-25; Appendix 3.15A, Attachments K.	Yes	

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of how the project's drainage design complies with these requirements.			
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	--	--	--
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	Appendix 3-15B, WSA, pp. 1 through31.	Yes	
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a computer modeling study shall be conducted by a professional geologist and include the estimated drawdown on neighboring wells within 0.5 mile of the proposed well(s), any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical	Appendix 3-15B, WSA, Section 2.2, pp. 5 through 7; Section 4.2, Table 6, pp. 11 through16; Section 7, p. 29.	Yes	

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

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Revision No. 0 Date: August 2025

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	conditions of groundwater resources shall be provided;			
Appendix B (g) (14) (iii)	The effects of construction activities and plant operation on water quality and to what extent these effects could be mitigated by best management practices;	Appendix 2A (Drawing No. PSR-CS-004 S001 - S014, PSR-CS-005 S001 & S002, PSR-CS-006 S001, PSR-CS-007 S001 – S006, PSR-CS-008 S001 & S002, PSR-CS-009, PSR-CS-010)	No	See DRs WATER-4 & WATER-5
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"	N/A	N/A	N/A
Appendix B (g) (14) (v)	If using fresh water, include a discussion of the cumulative impacts, alternative water supply sources and alternative cooling technologies considered as part of the project design. Include an explanation of why alternative water supplies and alternative cooling are "environmentally undesirable," or "economically unsound;"	Appendix 3-15B, pp. 1 through 13, Table 1 through 11, Figures 1- 6, Appendix A through E.	Yes	

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

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Revision No. 0 Date: August 2025

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Technical Senior: Abel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones; and	Subsection 3.15.1.5, p. 3.15-7.	Yes	
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	Appendix 3-15A, Attachment J, p.p. 1-7, and Exhibits.	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.15.5, Table 3.15-3, p.p. 3.15-16 - 3.15-25; Table 5-1, pp. 5-1 through 5-15.	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.15.6, Table 3.15-4, p. 3.15-26; Table 6-1, pp. 6-1 through 6-5.	Yes	

Completeness: Complete Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

Project: Prairie Song Reliability Project

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Technical Senior: Abel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 3.15-4, p. 3.15-26; Table 6-1, p.p. 6-1 through 6-5.	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.15.6,& Table 3.15-4, p. 3.15-26.	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Wildfire Project: Prairie Song Reliability Project Technical Staff: Paul Miller
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.16.1 to 3.16.3, pp. 3.16-2 through 3.16-19	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.16.2, pp. 3.16-9 through 3.16-19, Figure 3.16-1	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.16.8, pp. 3.16-31 through 3.16-32	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to	Subsection 3.16.1 to 3.16.4, pp. 3.16-1 through 3.16-21	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: August 2025
 Technical Area: Wildfire Project: Prairie Song Reliability Project Technical Staff: Paul Miller
 Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (19) (A)	A map showing State Responsibility Areas (SRA,) as defined in Public Resources Code section 4102, relative to the proposed project.	Figure 3.16-2, p. 3.16-35	Yes	
Appendix B (g) (19) (B)	A map showing state Fire Hazard Severity Zones, as defined in 14 CCR section 1280.01, relative to the proposed project.	Figure 3.16-2, p. 3.16-35	Yes	
Appendix B (g) (19) (C)	If the project would be in the vicinity of an SRA or a Very High Fire Hazard Severity Zone, as defined in 14 CCR section 1265.00, provide:	--	--	--
Appendix B (g) (19) (C) (i)	Local emergency response or evacuation plans and a description of how the proposed project could influence their effectiveness.	Subsection 3.16.1.9, pp. 3.16-7 through 3.16-9	No	See DR WF-1
Appendix B (g) (19) (C) (ii)	A discussion of how potential project pollutants could be contained onsite during a wildfire event.	Subsection 3.16.2.3, pp. 3.16-11 through 3.16-16	Yes	
Appendix B (g) (19) (C) (iii)	A description of infrastructure that would be built or maintained (such as roads, fuel breaks, emergency water sources, power lines or other	Subsection 3.16.2.3.3, pp. 3.16-16 through 3.16-18	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: August 2025
Technical Area: **Wildfire** Project: Prairie Song Reliability Project Technical Staff: Paul Miller
Project Manager: Lisa Worrall Docket: 25-OPT-02 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	utilities) that may exacerbate the risk of wildfire.			
Appendix B (g) (19) (C) (iv)	Describe people or structures downslope or downstream of the proposed project that could be impacted by flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Subsection 3.16.2.3.4, pp. 3.16-18 through 3.16-19	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: August 2025

Technical Area: Worker Safety

Project: Prairie Song Reliability Project

Technical Staff: Michele Shi

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.17.1 to 3.17.2, p. 3.17-1 through 3.17-2	No	See DR WS-17 to DR WS-18 and DR WS-20 to DR WS-24
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.17.2, p. 3.17-2	No	DR WS-17 to DR WS-18 and DR WS-20 to DR WS-24
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Subsection 3.17.3, p. 3.17-22	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Subsection 3.17.1 to 3.17.2, p. 3.17-1 through 3.17-21	No	See DR WS-9 to DR WS-12, DR WS-19, DR WS-20 to DR WS-24

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Revision No. 0 Date: August 2025

Technical Area: **Worker Safety**

Project: Prairie Song Reliability Project

Technical Staff: Michele Shi

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Subsection 3.17.2.3.3, p. 3.17-18 through 3.17-19	No	See DR WS-6
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Subsection 3.17.2.4, p. 3.17-20 through 3.17-21	No	See DR WS-13 to DR WS-16 and DR WS-25
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	--	--	--
	Construction Health and Safety Program:	Subsection 3.17.2.3.1, p. 3.17-6	Yes	
	• Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);			
	• Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);	Subsection 3.17.2.3.1, p. 3.17-6 through 3.17-7	Yes	
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)	Subsection 3.17.2.3.1, p. 3.17-7	Yes	
	Operation Health and Safety Program:	Subsection 3.17.2.3.2, p. 3.17-12	Yes	
	• Injury and Illness Prevention Program (8 Cal. Code Regs., §3203);			
	• Fire Prevention Plan (8 Cal. Code Regs., § 3221);	Subsection 3.17.2.3.2, p. 3.17-12, Subsection 3.17.2.4, p. 3.17-19 through 3.17-21	No	See DR WS-5 to DR WS-6
	• Emergency Action Plan (8 Cal. Code Regs., § 3220);	Subsection 3.17.2.3.2, p. 3.17-13	No	See DR WS-6 to DR WS-12

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Revision No. 0 Date: August 2025

Technical Area: **Worker Safety**

Project: Prairie Song Reliability Project

Technical Staff: Michele Shi

Project Manager: Lisa Worrall

Docket: 25-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	<ul style="list-style-type: none"> Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411). 	Subsection 3.17.2.3.2, p. 3.17-13	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 3.17-5, p. 3.17-22 through 3.17-23	No	See DR WS-1 to DR WS-4
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 3.17-6, p. 3.17-24	No	See DR WS-1 to DR WS-4
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 3.17-6, p. 3.17-24	Yes	

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.17.5, p. 3.17-24	Yes	

Attachment B

Data Requests

ATTACHMENT B

DATA REQUESTS

MANDATORY OPT-IN REQUIREMENTS

California Code of Regulations, title 20, section 1877(f) requires Opt-In Applications to identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. California Code of Regulations, title 20, section 1879 (a) (7) further states that the net positive benefits identified in an Opt-In Application may include, but are not limited to the following: (a) employment growth, (b) housing development, (c) infrastructure and environmental improvements, (d) assistance to public schools and education, (e) assistance to public safety agencies and departments, and (f) property taxes and sales and use tax revenues.

The applicant's Opt-In Application includes a discussion of net economic benefits to Los Angeles County in Sections 1.6.6 and 3.10, and Appendices 1E and 3.10A. The application discusses quantitative benefits such as employment growth, property taxes, and sales and use tax revenues, in addition to qualitative discussion of infrastructure and environmental improvements, and assistance to local institutions.

To determine accurate estimates of the net economic benefits to Los Angeles County, staff request the applicant to provide further information. Specifically, the California Energy Commission (CEC) would like to understand whether the project qualifies for federal tax credits for project infrastructure or installation, and if so, at what total deduction.

DR MAND-1. Per California Code of Regulations, title 20, section 1877(f) requirement, please provide response to the following question:

- a. Does the facility qualify for a federal tax credit? If so, identify the rate and the total deduction amount for the facility.

AIR QUALITY

Public Resources Code, section 25545.1(b)(1) provides that the issuance of a certificate by the CEC is in lieu of any local air quality permit that would have been issued from the Antelope Valley Air Quality Management District (AVAQMD or District) and such permit requirements are incorporated into the CEC's Opt-In application requirements in California Code of Regulations, title 20, section 1877(d), Appendix B, and CEC's certification. Per California Code of Regulations, title 20, Appendix B (g) (8) (A), to assist CEC staff and the District in reviewing the project, the applicant should submit the necessary information to the District to complete an evaluation of the proposed emergency generators. To ensure the District's requirements are contained in the CEC's

Staff Assessment (including an Environmental Impact Report (EIR)) and certification, staff needs copies of all correspondence between the applicant and the District in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

DR AQ-1. Since three emergency generators would be used, please provide a completeness determination letter from the AVAQMD confirming that the application for the proposed emergency generators submitted to the District has been deemed complete.

In Section 3.1.3 of the application, the applicant lists estimated emission rates of criteria pollutants for construction and operation of the project. To validate the applicant's work, staff requests the spreadsheets that the applicant used to estimate emissions.

DR AQ-2. Please provide a copy of the spreadsheet file of the emissions calculations with live, embedded calculations used for estimated emission rates of criteria pollutants in Table 3.1-6, Table 3.1-7 and Table 3.1-11.

In Table 3.1-12. Level 1 Operational Ambient Air Quality Assessment Results – Unmitigated, the maximum project contribution for 24-hours PM_{2.5} and PM₁₀ are shown as 4.41 µg/m³. However, Table 4 in Appendix 3.1B shows that the project contribution for 24-hour PM_{2.5} and PM₁₀ are 0.29 µg/m³. In addition, Table 4 in Appendix 3.1B shows that the background concentration as 36 µg/m³. But the cumulative concentration is shown as 35.99 µg/m³, which is lower than the background concentration.

DR AQ-3. Please clarify the maximum project contribution for 24-hour PM_{2.5} and PM₁₀ during project operation.

DR AQ-4. Please clarify the background concentration for 24-hour PM_{2.5}.

ALTERNATIVES

California Code of Regulations, title 20, Appendix B (f) (1) requires that in accordance with Public Resources Code section 25540.6(b), the application shall include a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site. California Code of Regulations, title 20, Appendix B (f) (2) also requires the application to evaluate the comparative engineering, economic, and environmental merits of the alternatives discussed in (f) (1).

Section 4 Alternatives, subsection 4.5.1 of the application (TN 264414) states that "...[a] total of 60 contiguous acres was used to identify the minimum viable project size." Subsection 4.5.1 states that "...[s]everal alternative site locations were considered but subsequently rejected from further analysis because they would result in greater

impacts than the Project, primarily due to the construction of a longer gen-tie line from the alternative site to the Vincent Substation and sloped terrain.” The application provides the site locations for two alternative sites (Mountain Springs Alternative Site and Peaceful Valley Alternative Site), but does not identify the locations of other sites that were initially considered by the applicant but subsequently rejected from further analysis. CEC staff would like to review these alternative site locations and reasons for their rejection. In addition, application subsection 4.5.1 explains that a two-mile radius was used as a criterion to screen alternative site locations to avoid a lengthy gen-tie line. However, staff do not consider generation-intertie lines (gen-tie) greater than two miles as infeasible, particularly if the longer gen-tie line allows for development of a site that has fewer impacts to sensitive resources such as residences, schools, recreation areas, biological resources, and cultural resources. Subsection 4.8 discusses a reduced project alternative that would only require a 45-acre footprint within the proposed project site. No alternative 45-acre sites were considered for the reduced project alternative outside of the proposed project site. To satisfy the requirements of Public Resources Code, section 25540.6(b), staff request the location of all alternative sites considered for the project, including sites that are located outside of the two-mile radius of the Vincent Substation and sites that may accommodate a 45-acre reduced project alternative.

Section 3.2 Biological Resources explains that the project’s gen-tie line would be sited in the Santa Clara River Significant Ecological Area (SEA), which is a Los Angeles County land use designation containing sensitive biological resources. Per the California Environmental Quality Act (CEQA), to avoid or substantially lessen any of the significant biological resources effects of the project, the alternatives analysis should include an alternative gen-tie line route that would avoid the County SEA. However, no alternative gen-tie line routes are discussed in application subsections 4.1 through 4.10 (TN 264414). Staff have reviewed maps of the project site and have noted that a gen-tie line could avoid the County SEA if it was sited northeast from the project along Carson Mesa Road or Soledad Canyon Road, and then continued east towards Vincent Substation along the northern side of the parcels located along Foreston Drive. Staff request that the applicant identify an alternative gen-tie line route that avoids the Santa Clara River SEA.

Section 2 Project Description, subsection 2.3.2 explains that the project’s 500-kV gen-tie would be constructed as an overhead transmission line. As noted in application subsection 3.6.2.3, Los Angeles County policies applicable to the project site include Antelope Valley Area Plan Policy COS 14.1, which requires new transmission lines to be placed underground. CEQA requires a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Therefore, the alternatives analysis should include an underground construction alternative for the project’s gen-tie line.

DR ALT-1. Per California Code of Regulations, title 20, Appendix B (f) (1) and Appendix B (f) (2), please provide the following:

- a. Provide a map (preferably with a KMZ file provided) and description (i.e., location, parcel number, size, etc.) of all alternative site locations initially considered for the project, including sites that are located outside of the two-mile radius of the Vincent Substation and smaller sites that could accommodate a 45-acre reduced project alternative; and
- b. Provide a map (preferably with a KMZ file provided) and description of an alternative gen-tie line route that avoids the Santa Clara River SEA (e.g., possibly extending northeast from the project site). In the description of the alternative gen-tie route, please provide information on right-of-way width, land use and zoning designations, parcel ownership, and adjacent land uses. If no such route was found to be feasible, please provide details on the justifications for the infeasibility conclusion (e.g., major highway crossings, geologic hazards, sensitive biological or cultural resources, etc.).
- c. Provide a map (preferably with a KMZ file provided) and description for an underground gen-tie line alternative. While staff encourages the applicant to evaluate more than one route for an underground gen-tie line, staff requests that the applicant provide information for at least one underground gen-tie line route that is located entirely outside of the Santa Clara SEA. For each underground gen-tie alternative, provide alternative data on major transmission components, estimated temporary and permanent disturbance acreages, and estimated construction activity duration.

BIOLOGICAL RESOURCES

DR BIO-1. Pursuant to California Code of Regulations, title 20, section 1704, (a) (3) (A), please provide representative photographs of the site, as available, particularly overview photos of large portions of the site, photos of portions that would be developed, and photos of features that may include state or federal waters or other potentially jurisdictional features such as intermittent and ephemeral streams. Very few photographs of the project site were provided in the Section 3.2 Biological Resources of the Application. Please provide any Biological Technical Reports as available, or as specifically further requested below.

Survey reports for rare plants and Crotch's bumble bee (*Bombus crotchii*) have not been provided for the southern gen-tie route option. Staff notes that the application indicates that fiber-optic telecommunications lines would be installed on the southern gen-tie route regardless of which gen-tie option is chosen to be built.

DR BIO-2. Provide a complete survey report for results of special-status plant surveys conducted for the southern gen-tie route, describing methodology and results, and also provide the names and resumes of staff completing the surveys. These surveys should be conducted following the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2021). As staff has not received all survey data for special-

status plant species, staff may provide additional data requests upon receipt of the requested information.

DR BIO-3. Please provide a complete survey report describing Crotch's bumble bee (*Bombus crotchii*) surveys conducted along the southern gen-tie route, describing methodology and results, and also provide the names and resumes of staff completing the surveys. Surveys should be conducted following the California Department of Fish and Wildlife (CDFW) *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). This information should be submitted as part of a comprehensive survey report covering all Crotch's bumble bee surveys conducted for the project. As staff has not received all survey data for this species, staff may provide additional data requests upon receipt of the requested information.

The surveys conducted by the applicant for Crotch's bumble bee may not be adequate to determine presence. Based on a review of survey Table 3.2-1 in the application (TN 264413) it appears that early season surveys (April to May), when botanical resources would have been present, were not conducted.

DR BIO-4. Please provide justification for why surveys for Crotch's bumble bee across the entire project area did not include early season surveys. Please explain why the surveys did not conform to the CDFW guidelines for bumble bee surveys (CDFW 2023), which recommend conducting surveys throughout the flight season.

Subsection 3.2.1.2.1 of the Application references the Upper Santa Clara River Integrated Regional Water Management Plan prepared by Kennedy/Jenks Consultants in 2014. However, the link to this plan provided in the references listed in Subsection 3.2.8 is broken.

DR BIO-5. Please provide an accessible link for the Upper Santa Clara River Integrated Regional Water Management Plan, prepared by Kennedy/Jenks Consultants, 2014.

The applicant is currently not seeking take authorization for Crotch's bumble bee, a candidate for listing pursuant to the California Endangered Species Act (CESA). Protocol surveys along the southern gen-tie route are ongoing, and results are outstanding at the time of staff's initial review of the Application. Should the survey results indicate potential for take, the applicant should consider submitting a take authorization application for Crotch's bumble bee.

DR BIO-6. Please provide survey results (performed pursuant to DR BIO-3) to demonstrate that no take is expected to result from project activities. Please also refer to DR BIO-4 and explain the rationale for not conducting surveys during appropriate period when floristic resources would have been available to Crotch's bumble bee.

If the applicant is requesting incidental take authorization, please provide all information that would be required in an ITP application for CESA-listed or candidate species, specifically Crotch's bumble bee, including an impacts analysis and proposed mitigation measures (Cal. Code of Regs., tit. 20, § 1877(a) (referencing Cal. Code of Regs., tit. 14, § 783.2(a)(1) through (a)(10)).

Several culverts or stream crossings are not included in Appendix 3.2-D. These include a culvert conveying water from NWW-1a under Soledad Canyon Road at 34.48392, -118.14375 and several areas where a stream intersects Foreston Drive at 34.48384, -118.13718. It is not clear if increased use of roads during construction and operation would result in siltation, need for culvert repair, or other impacts to streams, including downstream impacts. This information is needed for staff to prepare an adequate impact assessment pursuant to CEQA (see also DR BIO-1, Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)), in addition to potentially forming part of a lake and streambed alteration application (Appendix B (g) (13) (D) (ii)), if necessary.

DR BIO-7. Describe and map any culverts or other potential jurisdictional features that would be in the work area, including those affected by project-related traffic. Describe how they would be affected by project construction and operation, and if any work, such as regrading or culvert repair, would be required to accommodate project-related traffic.

The feature NWW-1a is described in Appendix 3.2-D as entering the review area from a culvert beneath Soledad Canyon Road, however the area north of the culvert, which is located within the battery energy storage system (BESS) facility's footprint, is not mapped. This information is needed for staff to prepare an adequate impact assessment pursuant to CEQA (See also DR BIO-1, Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)), in addition to potentially forming part of a lake and streambed alteration application (Appendix B (g) (13) (D) (ii)), if necessary.

DR BIO-8. Please provide updated maps and waters delineations that include the portion of NWW-1a north of the culvert. Please update GIS shapefiles accordingly.

The Lake and Streambed Alteration (LSA) Notification included in Appendix 3.2-D (TN 264472) states that the "proposed substation and BESS will be constructed on a raised pad and runoff from this area will drain southwest into catch basins located across the site", but it does not discuss how the flow of existing streams on the site would be rerouted. In addition, the LSA Notification states that "In the event stormwater basins reach capacity, stormwater will be discharged from the detention basins via storm drainpipes and sheet flow at rates no greater than pre-development conditions following natural drainage patterns." However, it is not clear where stormwater would be discharged or what method would be used to ensure that flow rates would not exceed pre-development patterns. This information is needed for staff to prepare an adequate impact assessment pursuant to CEQA (See also DR BIO-1, Cal. Code Regs.

Tit. 20 § 1704, (a) (3) (A))), in addition to potentially forming part of a lake and streambed alteration application (Appendix B (g) (13) (D) (ii)), if necessary.

DR BIO-9. Please provide further details about drainage design of the BESS facility during operation. Discuss how the flow of any streams which would be filled, including but not limited to NWW-1a, NWW-1b, and NWW-1c, would be diverted. Provide clarification whether the drainages would be culverted under the developed area, routed around it, diverted to join the stormwater control system, or addressed via another option. Provide the location and method of discharge in the event that stormwater basins reach capacity.

The Application (TN 264413) is unclear regarding whether the project applicant is seeking a Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW), or if it is seeking lake and streambed alteration authorization under Fish and Game Code section 1602 from the CEC under its in-lieu permitting authority. Section 3.2.6 of the Application (TN 264413) states that the “project is expected to require a Lake or Streambed Alteration Agreement from CDFW” and proposes MM-BIO-7, which references “wildlife handling and relocation methodology from the CDFW-issued Streambed Alteration Agreement”. However, a list of required permits in Section 1 Executive Summary, subsection 1.6.4 does not include a Lake and Streambed Alteration Agreement from CDFW, and Subsection 3.2.5.2 (TN 264413) discusses using the Assembly Bill 205 opt-in process to obtain in-lieu permitting from the California Energy Commission (CEC). Under Opt-In, the CEC serves as the exclusive permitting authority for covered state permits, including those under Fish and Game Code, section 1602. This information is needed for staff to prepare an adequate impact assessment pursuant to CEQA (See also DR BIO-1, Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A))), in addition to potentially forming part of a lake and streambed alteration application (Appendix B (g) (13) (D) (ii)), if necessary.

DR BIO-10. Please confirm that the applicant is seeking in-lieu permitting coverage from the CEC. If a Lake and Streambed Alteration Notification has been submitted to CDFW, the applicant should withdraw the online Environmental Permit Information Management System (EPIMS) Notification to CDFW to avoid duplicative permitting.

DR BIO-11. Please prepare and submit the information that would be included in an LSAA notification for project activities in redline and strikeout format. Include all information as required in Fish and Game Code, section 1602(a)(1)(A) through (F) in a standalone document and incorporate responses to DR BIO-7 through DR BIO-10. Please submit a clean and redline and strikethrough version of the revised information that would be included in an LSAA notification.

The new access roads proposed to be built during project construction are not included in impact maps (e.g., Figures 3.2-1, 3.2-5a, 3.2-7, 3.2-8, and 3.2-9, impact shapefiles, or in the impact analysis (Subsection 3.2.2) and proposed Mitigation Measures (Subsection 3.2.4). These roads extend due west from Tower 10, due south from Tower

9, and approximately northwest from Tower 4 (if the southern gen-tie route alternative is chosen), as shown in Section 1 Executive Summary, Figure 1-3 of the Application (TN 264413). If impacts in these areas (i.e. access roads associated with Towers 10, 9, and 4 as previously described) were not addressed in maps, shapefiles, analysis, or proposed Mitigation Measures, the project is required to update the calculations of project impacts and compensatory mitigation acreage for jurisdictional waters including waters of the state and waters subject to Section 1600 of the California Fish and Game Code, native vegetation communities, special-status species habitat, and numbers of plants (e.g. cacti), subject to the California Desert Native Plants Act. This information is needed for staff to prepare an adequate impact assessment pursuant to CEQA (See also DR BIO-1, Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A))), in addition to potentially forming part of a lake and streambed alteration application (Appendix B (g) (13) (D) (ii)), if necessary.

DR BIO-12. Please submit updated figures and GIS shapefiles that include all project access roads and any other project-related disturbances, as part of the defined project area (see Fish and Game Code, section 1602).

The Application does not provide descriptions of species, associated impacts, and project feature or location, and severity or duration of impact, as required by California Code of Regulations, title 20, Appendix B (g) (1) for all special-status species. For example, in Section 3.2.1.10 of the Application (TN 264413), no specific information is provided regarding the location, duration, or type of impact within the Study Area for Blainville's horned lizard (*Phrynosoma blainvillii*). In addition, Section 3.2.1.10 only provides general species accounts and does not provide details for onsite habitat conditions.

DR BIO-13. Provide a table detailing temporary and permanent acres of impact by project component and habitat type within the Study Area.

DR BIO-14. Clearly depict temporary and permanent impacts throughout the document and include a description of the specific location(s), habitat types being impacted and acreage amounts, and other relevant information. This should include any area added to the project's impacts per DR BIO-12. Please submit a clean and redline and strikethrough version of Section 3.2.5.

Figure 3.2-2 in the Application (TN 264413) depicts Mountains Recreation and Conservation Authority (MRCA) lands outside a 10-mile buffer distance from the project site. However, page of 3.2-4 of states that the northern gen-tie option would span parcels managed by the MRCA that are deed restricted for open space use.

DR BIO-15. Please provide an updated map and/or written description that clarifies the location of MRCA lands in relation to the project components and resolves the apparent inconsistency between Figure 3.2-2 and the text on page 3.2-4.

The description of which species are included in the "Potential to Occur" table in Appendix 3.2-B (TN 264407) is inconsistent. Further, the methodology used may exclude species found within 10 miles of the project as required by California Code of Regulations, title 20, Appendix B (g) (13) (A).

Page 3.2-7 of the Application (TN 264413) states that "Appendix 3.2B provides a list of special-status species with records within the two (2) USGS 7.5-minute topographic quadrangles (Acton and Pacifico Mountain) and the surrounding 10 quadrangles Study Area during the literature review", while page 3.2-17 states that a "A list of all special-status plant species known to occur in the vicinity of the Study Area (and the surrounding nine (9) topographic quadrangles) including their habitat requirements, potential to occur onsite, and survey observations, is provided in Appendix 3.2B". In addition, page 3.2-18 states that "the two [2] USGS 7.5-inch quadrangles that the Study Area is in and the surrounding 10 quadrangles" was used to generate the special-status wildlife list. Therefore, animal species included in the potential to occur table were based on a 12-quadrangle search, while plant species included were based on a 9-quadrangle search.

As the project site is near the eastern edge of the Acton quadrangle, the 9-quadrangle search used for plants excludes areas of the Littlerock and Juniper Hills quadrangles, which are located within 10 miles of the project site. Additionally, as the project site is near the northern edge of the Acton quadrangle, both the 9-quadrangle search used for plants and the 12-quadrangle search used for animals exclude a small portion of the Lancaster West and Lancaster East quadrangles, which are located within 10 miles of the project site.

DR BIO-16. Please revise the methodology used for conducting the special-status species database search to include, at minimum, all areas within 10 miles of the project site per the requirements California Code of Regulations, title 20, Appendix B (g) (13) (A). Include the updated description of methodology, the revised potential to occur table in Appendix 3.2-B, and any relevant species discussion or protective measures accordingly. Please use consistent methods for all species, not separate methods for plants and animals. Please submit a clean and redline and strikethrough version of Section 3.2.5 and Appendix 3.2-B. See also DR BIO-12 and DR BIO 14.

The list of species observed and the potential to occur tables in Appendix 3.2-B (TN 264407) lack titles or descriptions in the appendix, so it is not clear from Appendix 3.2-B alone what these items are intended to represent.

DR BIO-17. For clarity, please resubmit Appendix 3.2-B and add a title and a brief description of what species are included to both the list of species observed and the potential to occur table in Appendix 3.2-B. Please submit a clean and redline and strikethrough version of the appendix.

Short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) and other cacti are covered under the California Desert Native Plants Act. However, this state law was omitted from Section 3.2.5. The removal of cacti requires a permit as well as a fee per plant removed in accordance with the California Desert Native Plants Act (Cal. Food and Ag. Code, division 23, ch. 3 §§ 80071–80075; and ch. 4 §§ 80101–80108). The California Desert Native Plants Act requires that a fee be paid to the County Commissioner for issuance of permits, wood receipts, tags, or seals required for lawful harvest or transport protected species. However, the CEC holds in-lieu authority over any county permits that would otherwise be required for the project and would incorporate permitting requirements into staff's conditions of certification. In order to identify where these species occur, all cacti must be counted and mapped.

DR BIO-18. Please include the California Desert Native Plants Act in the LORS table and include a discussion in Section 3.2.5 of the Application. Please submit a clean and redline and strikethrough version of Subsection 3.2.5 of the Application. See also DR BIO-12, DR BIO-14, and DR BIO-16.

DR BIO-19. Please provide a complete census report of short-joint beavertail, and any other cactus species such as Wiggins' cholla (*Cylindropuntia echinocarpa*), beavertail pricklypear (*Opuntia basilaris* var. *basilaris*), coast prickly pear (*Opuntia littoralis*) on the site, or within 500 feet offsite, including linear features. Please also include maps at an appropriate scale and provide GIS shapefiles with pertinent metadata. See also DR BIO-12.

California Code of Regulations, title 20, Appendix B (g) (13) (A) (vi) requires the Opt-In application include a discussion of locally significant species that are rare or uncommon in a local context, such as county or region, or is so designated in local or regional plans, policies, or ordinances. Significant Ecological Areas (SEAs) are officially designated areas within Los Angeles County that contain irreplaceable biological resources.

As defined in subsection 22.102 (HH) of the SEA Ordinance, "Sensitive Local Native Resources" include species identified by the Los Angeles (LA) County Department of Regional Planning to be rare or uncommon in the county or within a specific SEA, due to, but not limited to, being at the outer limits of their known range, having declining populations in the region, occurring in naturally small populations, being dependent on habitat that is declining in size and quality, having few records within the region, or having historically been abundant in the region, but for which there are no recent records.

Subsection 22.102 (FF) (3) identifies Sensitive Local Native Resources as a SEA Resource Category 3 classification. As stated in the SEA Implementation Guide (Los Angeles County Planning 2020; Appendix B, pg. 112), the county-wide list for native plant species that meet the definition of "Sensitive Local Native Resources" is currently in development; however, staff is aware that the list has been developed to a degree

that currently allows the County to identify certain SEA areas that currently support or potentially support these resources.

Additionally, the SEA Implementation Guide (Los Angeles County Planning 2020; Appendix B, pg. 112) describes that avian species on the Audubon Society's "Los Angeles County Sensitive Bird List" should be considered as "Sensitive Local Native Resources" in all SEAs. The list of species defined as sensitive in Los Angeles County can be found at: <https://planning.lacounty.gov/wp-content/uploads/2022/11/LA-Countys-Sensitive-Bird-Species.pdf>.

DR BIO-20. Please provide documentation, including copies of any correspondence, of whether the applicant coordinated with the LA County biologist at the LA County Department of Regional Planning to determine if there are any known native plant species occurrences that meet the definition of "Sensitive Local Native Resource" within survey area for the generation tie-line.

If it is determined that native plant species are known to be present, that were not previously addressed, please update the potential for the species to occur accordingly in the "Special-Status Plants" table in Appendix 3.2B of the Application.

Additionally, if it is determined that any avian species meeting the definition of "Sensitive Local Native Resource" are not already listed in the table and have the potential to occur within 10 miles of the project area, please resubmit the "Special-Status Wildlife" table in Appendix 3.2B to reflect with the potential to occur within 10 miles of the project area. Please submit a clean and redline and strikethrough version of both tables.

As required by California Code of Regulations, title 20, Appendix B (i) (1) (A), Table 3.2.11 in the Application (TN 264413) states that the project would conform with the LA County Department of Regional Planning requirements under the SEA Ordinance (LA County Code, title 22, division 5, sections 22.102 et seq.) through mitigation in accordance with the ordinance and CEQA guidelines. The ordinance requires the submittal of application materials (see DR BIO-21) that would be necessary for the issuance of a Conditional Use Permit (CUP) or its equivalent under the CEC's in-lieu permitting authority and in compliance with the currently adopted SEA Ordinance.

It should be noted that Senate Bill (SB) 1425 (passed in 2022; adding Section 65565.5 to the Government Code), and AB 1889 (passed in 2024; amending Section 65302 of the Government Code), mandate updates to open space plans and general plans, focusing on equitable access, climate resilience, rewilding, and wildlife and habitat connectivity. SB 1425 requires cities and counties to update their open-space plan elements by January 1, 2026, while AB 1889 requires updates to general plan conservation elements on or after January 1, 2028. Subsequently, staff is aware that LA County is currently addressing mandated updates to their 2035 General Plan and the

SEA Ordinance, which is a component of the Conservation and Natural Resources Element of the general plan.

DR BIO-21. Please provide the following materials to allow CEC to determine whether the project would conform with the SEA Ordinance under the SEA Ordinance:

1. Biological Constraints Map (BCM). The BCM should be consistent with the requirements defined under Section 22.14.190 (D) of the SEA Ordinance and Chapter 6 (pp. 64-65) of the SEA Implementation Guide. Please provide documentation that the BCM has been prepared by a consulting biologist that is on the SEATAC Certified Consultants List at the time of preparation.
2. Conceptual Project Design. A Conceptual Project Design (CPD), required under section 22.102.050 (A) (3) of the SEA Ordinance and consistent with Chapter 5, no. 3 (p. 54) of the SEA Implementation Guide. The CPD can be shown directly on the BCM or separately as a Conceptual Site Plan.
3. Biota Report. The SEA Ordinance requires the submittal of a Biological Constraints Report and/or a Biota Report. A Biota Report that includes a thorough discussion of the baseline conditions in the project area will be sufficient for submittal to the CEC and should be a standalone document. The Biota Report, required under section 22.102.080 (B) (1) (b) of the SEA Ordinance should be consistent with the requirements defined in Chapter 6 (pp. 67-68) of the SEA Implementation Guide. Please provide documentation that the Biota Report has been prepared by a consulting biologist that is on the SEATAC Certified Consultants List at the time of preparation.
4. Protected Tree Report. A Protected Tree Report is required under section 22.102.070 (C) (2) of the SEA Ordinance. Please submit a standalone report that includes all details defined in number (a) through (e) of that section of the SEA Ordinance. For further guidance, please refer to Chapter 3 of the SEA Implementation Guide. Please provide documentation that the Protected Tree Report has been prepared by a Qualified Arborist or resource specialist as required under the SEA Ordinance.

Please provide any GIS shapefiles used for the development of maps and figures associated with the submittals requested under Items 1 through 4.

Per California Code of Regulations, title 20, Appendix B (g) (13) (B) regulations the Opt-In Application is required to include a list of species observed within 1,000 feet of the linear facility corridors. However, page 3.2-3 of the Application (TN 264413) describes the Study Area as consisting of the project site and a 100-foot buffer. The Study Area should extend to 1,000 feet for the linear facility corridors. In addition, maps showing areas surveyed were not provided.

DR BIO-22. Please provide a description of species expected to occur, as well as those observed, within 1,000 feet of the linear facility corridors.

DR BIO-23. Please provide detailed maps indicating where biological surveys were conducted, including transects, surveys routes, and/or polygons of surveyed area.

California Code of Regulations, title 20, Appendix B (g) (13) (B) (iii) requires maps showing “showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance”. The Aquatic Resources Delineation Report, included as Appendix 3.2-D (TN 264472, TN 264477, and TN 264476) does not meet this requirement. For example, the feature NWW-1c is not mapped as it crosses under the railroad tracks and in addition as it continues to the southwest of the disturbance area.

DR BIO-24. Provide an aquatic delineation that extends 250 feet from the edge of disturbance. Areas where access is not available and disturbance would not occur may be mapped using aerial imagery or similar methods, if distinguished from ground-truthed delineation in maps and narratives.

California Code of Regulations, title 20, Appendix B (g) (13) (B) (iv) requires GIS data for all data mapped for biological resources.

DR BIO-25. Please provide GIS shapefiles for the biological survey coverage map, juniper map, California Desert Native Plants Act, changes to the waters maps, and any other maps described in the data requests.

Page 3.2-3 of the Application (TN 264413) states that Crotch’s bumble bee “survey passes were led by Callie Amoaku, who holds a Memorandum of Understanding (MOU) and Scientific Collecting Permit (SCP) to capture Crotch’s bumble bee. Dudek conducted three protocol level surveys for Crotch’s bumble bee spaced in June and July 2024 (June 11, July 1 and July 17). The surveys were conducted by qualified biologists with experience in surveying for Crotch’s bumble bee.” Table 3.2-1 in the Application only lists Callie Amoaku as conducting surveys on June 12, 2024 and May 21, 2025. Callie Amoaku is not listed as conducting surveys on July 1, July 24 or July 25, 2024. According to CDFW’s survey guidance, surveyors must be qualified to conduct surveys for candidate bumble bee species. Qualifications may include coursework, bumble bee-specific workshops, or focused survey experience. Additionally, detailed survey methodology was not included.

DR BIO-26. Please provide an updated resume that demonstrates the qualifications and relevant experience of Josh Elson in conducting surveys for Crotch’s bumble bee or other applicable bumble bee survey qualifications. Please provide a detailed description of the survey methodology used for the protocol-level surveys, consistent with CDFW’s survey guidance for candidate bumble bee species.

MM-BIO-5 in Subsection 3.2.4.1 of the Application (TN 264413) proposes the establishment of a conservation easement area that would preserve up to

approximately 162 acres of native vegetation communities within the Study Area parcels associated with the gen-tie routes, however this is alternately reported on page 3.2-38 of the application as requiring “the establishment of a conservation area that will preserve up to 648 California juniper acres of Water Resources in the Study Area parcels”. In addition, no figures or GIS shapefiles of the proposed compensatory mitigation land are provided, so it is unclear where these lands are located.

DR BIO-27. Clarify the total amount of compensatory mitigation land proposed under MM-BIO-5 and ensure consistency between references to MM-BIO-5 in the application.

DR BIO-28. Provide figures and GIS shapefiles showing the proposed mitigation land to be protected under a Conservation Easement.

The suitability of proposed compensatory mitigation land for each species is not discussed. Additionally, is it unclear which species and habitats (eg. special-status species, habitat types, waters of the state, and individual plants subject to the California Desert Native Plants Act) the proposed compensatory mitigation land is designated as mitigation for.

DR BIO-29. Clarify if compensatory mitigation land for each species and habitat will overlap. Discuss the suitability of the proposed compensatory mitigation land for each species based on information in the requested Biological Technical Report (see DR BIO-1). Identify the aquatic resources and where the aquatic resources would be within the mitigation lands. Clearly identify the exact areas, and provide the number of acres, within the mitigation site where habitat would be provided for species proposed to be covered for take or other compensatory mitigation proposed by the applicant. Identify each area by habitat type (e.g. native vegetation communities).

There is no title report for proposed compensatory mitigation land, and there is no discussion of easements or encumbrances on proposed compensatory mitigation land. It is unclear if there are conflicting easements or encumbrances that would preclude the use of this land for habitat mitigation, such as severed mineral rights, Williamson Act contracts, or subdivision prohibitions. It is also unclear if the land is already conserved, in which case using the land as mitigation would likely not be appropriate. Further, any potential environmental hazards from the proposed mitigation lands’ historic or current uses should be fully investigated and disclosed to determine the feasibility of the proposed mitigation lands.

DR BIO-30. Please provide a title report or similar documentation demonstrating that there are no conflicting easements or encumbrances on the proposed mitigation land, and that the land is not already conserved under a conservation easement or similar mechanisms. Please provide a Phase I Environmental Site Assessment for the proposed mitigation land.

California Code of Regulations, title 20, Appendix B (i) (1) (B) requires a table of agencies with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities etc. This table was not provided.

DR BIO-31. Please provide a table of agencies with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities, as required by California Code of Regulations, title 20, Appendix B (i) (1) (B).

The table of agency contacts (Table 3.2-13) in the application (TN 264413) is mislabeled and is missing information. The table is required by Code of Regulations, title 20, Appendix B (i) (2). The email provided for CDFW is to a regional shared email mailbox.

DR BIO-32. Please update Table 3.2-13 to include addresses of agencies as well as names, titles, phone numbers, and correct email addresses, as publicly available, of the person contacted at each agency.

DR BIO-33. Verify that CDFW and the U.S. Fish and Wildlife Service were the only agencies contacted. Alternatively, update the table to add other agency contacts.

Subsection 3.2 of the Application does not include a schedule of when the applicant expects to receive a 401 water quality certification from the Regional Water Quality Control Board or any other required permit, as required per California Code of Regulations, title 20, Appendix B (i) (3).

DR BIO-34. Please update Section 3.2.6 of the Application to include the estimated timeline for receiving a 401 water quality certification or Waste Discharge Requirement (WDR) from the Regional Water Quality Control Board. If additional state permits are required, please provide similar estimated timelines for each.

REFERENCES CITED

- CDFW 2021 - California Department of Fish and Wildlife (CDFW). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. March 20, 2018, with updates in February 2021. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>
- CDFW 2023 - California Department of Fish and Wildlife (CDFW). "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species". June 6, 2023.

Los Angeles County Planning 2020 - Significant Ecological Areas (SEA) Ordinance Implementation Guide. 133 pp. January 16, 2020. Available at: <https://planning.lacounty.gov/long-range-planning/significant-ecological-areas-program/>.

CULTURAL AND TRIBAL CULTURAL RESOURCES

DR CUL/TRI-1. The ethnohistoric setting in Section 3.3 Cultural Resources and Tribal Cultural Resources, subsection 3.3.1 and Appendix 3.3A of the Application lacks discussion of the individual groups during this period. Please provide an Ethnographic Context (Ethnographies) for the Native American tribes within the 5-mile radius of the project location as required by Appendix B (g) (2) (A). This should include the Chemehuevi, Serrano, Kawaiisu, Kitanemuk, Alliklik (Tataviam), and Vanyume.

DR CUL/TRI-2. In Appendix 3.3A, Appendix E, the Department of Parks and Recreation form 523 for the newly recorded resource ABS-JC-S-05 is missing page 5 of 6. Please submit a complete site record for ABS-JC-S-05 per Appendix B (g)(2)(iii).

DR CUL/TRI-3. Appendix 3.3A, Appendix C: Cultural Resources Overview Map, includes five points indicating a known built environment resource without a clear label of which resource is being indicated by their presence. Additionally, all built environment resources discussed in the Built Environment Inventory and Evaluation Report in Appendix 3-3B, appear to already be labeled by other points indicated on the map. Please update this map, and, if necessary, update Appendix 3-3B, to reflect these potential resources as well.

DR CUL/TRI-4. Section 2 Project Description, subsection 2.4.4, p. 2-20 states, "Fill material requirements will be satisfied by offsite borrow pits or quarries." To help avoid cultural resources and unknown buried cultural resources please provide information on where the fill material would be obtained from, a map of their locations relative to the proposed project, and whether they are licensed to sell fill material for use elsewhere. If they are not licensed, then environmental review of the locations would likely be required.

GEOLOGICAL HAZARDS

Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) requires a description of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. Appendix B (g) (17) (B) requires a map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. It also requires an analysis of the likelihood of ground rupture and seismic shaking, mass wasting and slope stability, liquefaction, subsidence, and expansion or

collapse of soil structures at the plant site and asks to describe known geologic hazards along or crossing linear facilities.

Four separate figures in Section 3.4 Geologic Hazards and Resources identify geologic units, faults, liquefaction risk and landslide susceptibility but do not contain all features within 2 miles of the project.

DR GEO-1. Please expand the maps to include the required scope of all required elements at least two miles from the project.

Section 3.4.2.3.1, part A states that there is no risk of fault rupture at the project site, however, a fault has been identified on Figure 3.4-2 that is 0.4 miles from the project and another less than one mile.

DR GEO-2. Please provide more detail and explanations on why these faults are not expected to impact the project.

Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) requires descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document, and a description of ongoing research of significant to the project. Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) requires a list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each reference. Appendix B (g) (17) (C) requires a map along with a description and discussion of techniques used to identify and evaluate geologic resources of value.

Subsections 3.4.2.3.4 and 3.4.2.3.5 along with Figure 3.4-5 identify the “mineral resource zones”. However, the text and figure do not identify what those resources are, where the information comes from specifically, or why the project would have no impact.

DR GEO-3. Please provide more detail and discussion on the minerals near the project and why the project is not expected to result in a significant impact to these resources.

Appendix B (i) (2) requires detailed contact information on officials contacted within permitting agencies involved in the project. Table 3.4-3 lists two required permits but does not list specific contacts beyond identifying the agency.

DR GEO-4. Please identify the agency contacts specifically.

GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)

Battery performance degrades over time, gradually decreasing the round-trip efficiency. Staff expects battery augmentation would be performed to offset battery degradation and maintain Project performance commitments, increasing auxiliary loads. Staff needs

to determine the total number of battery enclosures by year 20 which would be the midpoint of the Project's life cycle.

Staff will also need the annual indirect GHG emissions calculations with estimated transmission and charging/discharging cycle losses and auxiliary loads for both the beginning (year-1) and midpoint of the Project life (20-year assuming a 40-year project life, as stated in the application). Staff needs the spreadsheet file of the emissions calculations with live, embedded calculations to complete the analysis.

DR GHG-1. Please estimate the annual indirect GHG emissions (metric tons) from transmission and charging/discharging cycle losses. Please include assumptions that account for the degradation of round-trip efficiency over the project lifetime in the calculation of indirect GHG emissions.

DR GHG-2. Please estimate the annual indirect GHG emissions from auxiliary loads. Please include assumptions that account for the BESS efficiency degradation over the project lifetime in the calculation of indirect GHG emissions.

DR GHG-3. Please provide a copy of the spreadsheet file of the emissions calculations with live, embedded calculations.

In Appendix 3.1A of the Air Quality and Greenhouse Gas Emissions Modeling and Calculations (page 110/119), the applicant proposes to use R-410A as the refrigerant for "other commercial A/C and heat pumps". However, the application does not demonstrate how the use of R-410A would comply with the Prohibitions on Use of Certain Hydrofluorocarbons (HFCs) in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 on Climate Change, Article 4, Subarticle 5, Section 95374).

In addition, on page 3.1-26 of the Application, it states that during operations and maintenance, one of the sources of GHG emissions could potentially be fugitive emissions from batteries containing difluoromethane (R-32) gas. R-32 has a global warming potential (GWP) of 771 using CO₂ at a reference value of 1 (IPCC 2024). However, according to the HFC prohibitions, new air conditioning units/chillers that use refrigerants with a GWP of 750 or greater have been prohibited. Staff needs analysis to demonstrate that the project would not conflict with regulations adopted for the purpose of reducing the emissions of greenhouse gases. In addition, staff needs clarification on whether R-32 or another refrigerant would be used for the BESS cooling system.

DR GHG-4. Please demonstrate how the use of R-410A, R-32, or any other refrigerant proposed for BESS cooling would comply with the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses. If not, please propose an alternative refrigerant, and provide

updated greenhouse gas emission estimates associated with the newly proposed refrigerant.

DR GHG-5. Please explain how the proposed refrigerant(s) would comply with the sale and distribution prohibition timelines established in SB 1206 (Skinner, Chapter 884, Statutes of 2022) (Health and Safety Code, section 39735).

DR GHG-6. Please confirm whether R-32 would be used for BESS cooling. If another refrigerant would be used, please provide the specifications of the refrigerant to be used and provide GHG emissions calculation due to refrigerant leakage.

In the Application Part 1, TN 264413 Table 3.1-17, under the emission source Energy, the value for total CO₂e emissions is 105,576 MTCO₂e. Please explain all assumptions that went into this calculation. This value seems a bit high for estimated annual operational GHG emissions. Staff needs confirmation whether this value is due to an input error.

DR GHG-7. Please confirm the value for the Energy operations use is 105,576 MTCO₂e, and if not, please revise this value.

According to Appendix G of the CEQA Guidelines (Cal. Code Regs. tit. 14, § Div. 6 Ch. 3 App. G) a project cannot conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (GHGs). In addition, according to Pub. Resources Code § 21183.6(a)(2), the applicant needs to demonstrate mitigation of the impacts resulting from GHG emissions. Staff needs more details on how the project would reduce GHG emissions, especially as it relates to the diesel-fueled emergency backup generators (backup generators) proposed as part of the project.

DR GHG-8. Explain how the proposed installation of the backup generators at the project site is consistent with the State of California's goal of achieving carbon neutrality no later than 2045.

DR GHG-9. What other technologies or fuel alternatives to diesel for the backup generators have you explored and why were they not pursued?

DR GHG-10. Has the project applicant explored the procurement of renewable diesel and/or carbon offsets as a means of demonstrating consistency with the State of California's goal of carbon neutrality? If not, why not?

In Section 3.1 Air Quality page 4.1-24, under refrigerants, states that the proposed circuit breakers and gas-insulated switchgear would contain sulfur hexafluoride (SF₆). However, according to the Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear, which became effective on January 1, 2022, starting on the applicable phase-out dates, no person may acquire SF₆

gas-insulated equipment (GIE) for use in California unless one of following provisions apply:

1. An SF₆ phase-out exemption was approved by the Executive Officer of the California Air Resources Board (CARB), or SF₆ GIE were acquired in response to a failure, pursuant to section 95357.
2. The SF₆ GIE device was present in California and reported to CARB pursuant to section 95355(a) for a data year prior to the applicable phase-out date listed in Table 1 or Table 2.
3. The SF₆ GIE device was purchased by the GIE owner prior to the applicable phase-out date listed in Table 1 or Table 2 for the relevant GIE characteristics and enters California no later than 24 months after the purchase date.
4. The SF₆ GIE manufacturer replaces a defective SF₆ GIE device under the terms of the manufacturer's warranty.

Staff needs to confirm which of the four provisions the applicant would rely upon to comply with the current SF₆ phase-out regulation and what the applicable phase-out date is based on the proposed GIE characteristics.

DR GHG-11. Please confirm which of the four provisions the applicant would rely upon to comply with the current SF₆ phase-out regulation. If the project would not qualify for the exemption, please propose an alternative to SF₆.

DR GHG-12. If the applicant is going to use option 3 of the provisions shown above, please provide the voltage capacity and short-circuit current rating of the proposed circuit breakers and gas-insulated switchgear and applicable phase-out date. Please confirm whether the proposed circuit breakers and gas-insulated switchgear would be purchased prior to the applicable phase-out date and enter California no later than 24 months after the purchase date.

HAZARDOUS MATERIALS HANDLING

Based on the results of the Phase I site assessments, Section 3.5, Hazards Materials Handling in the Application recommended measure Mitigation Measure (MM) HAZ-1 Railroad Soil and Ballast Management to mitigate potential public health and environmental effects. Under this measure, prior to grading within an approximately 100-foot buffer of the railroad track ("railroad area"), the Project Owner shall conduct sampling and analysis on the ballast rock and soils within this portion of the BESS Facility Site. Ballast rocks within the approximately 100-foot buffer of the railroad track ("railroad area") will be evaluated for asbestos; asbestos survey, sampling, and analysis must be completed by a technician or supervisor certified for asbestos survey by the California Department of Health. Soils will be sampled and analyzed for polycyclic aromatic hydrocarbons, herbicides, metals, petroleum hydrocarbons, and volatile organic compounds. If analytical results exceed regulatory screening levels applicable to future project development a soil management plan (SMP) will be prepared to manage

contaminated soils. According to the Application, the testing and potential development of the SMP shall be submitted to the CPM for review and approval before the Project Owner begins earthwork in the railroad area.

The Soil Sampling and conditional development of the SMP are proposed to be implemented as a mitigation measure (MM HAZ-1), but that testing must occur now during staff's review of the application. This information will provide the required discussion per Appendix B (g) (1) of the existing site conditions and assist in evaluation of the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project. Furthermore, the SMP may not be conditional, but must be developed (regardless of measured contamination levels in the sampling) to be in place during project construction to address protocol for suspected contaminated soils identified during construction.

DR HAZ-1. Please prepare and implement a soil sampling plan for the project site consistent with sampling identified in MM HAZ-1 from the application. The actions in the Soil Management Plan shall address contaminated soils identified prior to construction and protocol for suspected hazardous soils identified during construction.

Subsection 3.5.2.3.1 of the Application does not adequately discuss fire and explosion risks associated with the project. Specifically, it does not directly discuss potential impacts of lithium battery fires during transportation of lithium batteries to the project site. The project would increase the potential for an accident involving lithium batteries being transported to the project site. Recent semi-truck accidents involving lithium batteries have resulted in the shutdown of I-80 near Nyack and I-15 near Baker.

DR HAZ-2. Please discuss actions that the project would implement to reduce the probability of lithium battery fires during transportation of batteries to and from the project site and actions to reduce the impact of such fires (if they occur) to motorists and nearby sensitive receptors.

Subsection 3.17.2.4 also fails to adequately discuss fire and explosion risks associated with the project. The Application describes the representative BESS enclosure as the Sungrow Power Titan II, with a lithium iron phosphate battery technology. Subsection 3.17.2.4 states "Each BESS enclosure will be NFPA 855, NFPA 68, and NFPA 69 compliant. Each BESS enclosure will be equipped with an automatic fire alarm and linkage control system, an explosion relief system, a combustible gas detection and alarm system, and an exhaust system." However, the Application does not provide detailed information on the explosion control and gas detection systems which are intended to mitigate fire and explosion risks.

Staff requires additional details for the project's proposed explosion control and gas detection systems in order to verify that the project has adequate features to mitigate adverse impacts to operations personnel, emergency first responders, and the public.

Staff requires complete descriptions of project features including but not limited to: the location(s) of project features, the specific listings and design standards, the more stringent local fire department requirements, and all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.

DR HAZ-3. Provide a schematic and complete description of the proposed explosion-control systems (e.g., exhaust systems, deflagration-relief venting systems, barricades, etc.) for the representative BESS enclosure. Provide a description of how the proposed explosion control systems will comply with the applicable NFPA standards (e.g. NFPA 68, 69, 855, etc.) and the Los Angeles County Fire Department requirements.

DR HAZ-4. Provide a schematic and complete description of the proposed gas detection systems for the representative BESS enclosure. Provide a discussion of the toxic vapors/emissions that could be produced if a battery container is damaged or thermal runaway occurs. Provide a discussion of the specific gas(es) or vapor(s) intended to be detected.

LAND USE

Per California Code of Regulations, title 20, section 1704 (a) (3) (A), an Opt-In Application for Certification must include descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. California Code of Regulations, title 20, Appendix B (g) (3) (A) and Appendix B (g) (3) (A) (i) also require the application to include a discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, and land uses within one mile of the proposed site and within one-quarter mile of any project-related linear facilities (i.e., residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses).

The project application does not provide sufficient detail of the existing land uses within one mile of the proposed site and within one-quarter mile of the proposed gen-tie, nor does it provide information on the methodology used (i.e., desktop survey, site reconnaissance, review of planning documents) to identify existing land uses within the project site's one-mile radius and within one-quarter mile of either side of the edge of the project gen-tie's right-of-way (ROW). In Section 3.6 Land Use, subsection 3.6.1.2 in the Application (TN 264413), the applicant states that land uses within the surrounding area include "...undeveloped and rural lands, multiple high-voltage transmission lines and an electrical substation, paved and rural roads, State Route 14, and railroad lines...a few single-family residences adjacent to the BESS site's northern and western boundaries, as well as a few other single-family residences in the vicinity of the gen-tie line routes." However, the Application does not provide an inventory of the existing land uses within one mile of the proposed site and within one-quarter mile of the proposed

gen-tie ROW as required per California Code of Regulations, title 20, Appendix B (g) (3) (A) and Appendix B (g) (3) (A) (i).

The project application also does not provide sufficient detail of the zoning designations applicable to the project site. While subsection 3.6.1.3 (TN 264413) discusses the project site's zoning, it does not identify any of the Los Angeles County overlay districts that are applicable to the site. CEC staff have reviewed Los Angeles County's online zoning code map (Z-NET) and determined that the project site is within the Acton Community Standards District (CSD). The discussion of current zoning districts in the Application at section 3.6 must be updated to reflect that the project is within the Acton CSD and is subject to the development standards of this overlay district. Furthermore, subsection 3.6.2 acknowledges that the project's gen-tie line would be located within the Santa Clara River Significant Ecological Area (SEA), but does not discuss the project's consistency with the County's SEA Ordinance (Los Angeles County Code Chapter 22.102).

DR LAND-1. Per California Code of Regulations, title 20, section 1704 (a) (3) (A), (a) (3) (B), (a) (3) (C), and California Code of Regulations, title 20, Appendix B (g) (3) (A) and Appendix B (g) (3) (A) (i), please provide the following:

- a. Provide a land use inventory of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses that are located within one mile of the project site and within one-quarter mile of the project gen-tie line ROW. The land use inventory should include a description of the methodology used (i.e., desktop survey and/or site reconnaissance) to develop the inventory. For each identified land use, please include the following information:
 - Land use name if applicable (e.g., business name, private residence, etc.)
 - Land use type (e.g., residential, commercial, recreational);
 - Land use designations and zoning designations;
 - Address or assessor parcel number; and
 - Approximate distance from the project site and/or the gen-tie line ROW.
- b. Provide an updated Application section 3.6 that identifies the Acton CSD and Santa Clara River SEA as zoning districts applicable to the project site, and provide a discussion of all relevant development standards and permitting requirements from the Acton CSD and Santa Clara River SEA.

California Code of Regulations, title 20, Appendix B (g) (3) (A) (ii) requires the application to discuss any recent or proposed zone changes and/or general plan amendments noticed by an elected or appointed board, commission, or similar entity at the state or local level. California Code of Regulations, title 20, Appendix B (g) (3) (B) requires the application to discuss the project's conformity with any long-range land use

plans and policies adopted by any federal, state, regional, or local planning agencies.

It should be noted that the Los Angeles County Board of Supervisors (BOS) has issued two motions that are relevant to the BESS and transmission line components of the proposed project but are not discussed in the project application. In December 2023, the County Board of Supervisors issued a motion to develop a permitting structure and development standards for BESS

(<https://file.lacounty.gov/SDSInter/bos/supdocs/186943.pdf>). In April 2024, the County Board of Supervisors issued a motion to update the Los Angeles County Renewable Energy Ordinance (REO) to identify renewable energy development zones and to incorporate best practices and development standards for renewable energy project development (<https://file.lacounty.gov/SDSInter/bos/supdocs/190264.pdf>).

As a result of these two Los Angeles County BOS motions, the Los Angeles County Department of Regional Planning (LA County Planning) is currently in the process of updating its 2016 REO and is anticipating the start of the environmental review process for the REO Update in Fall 2025. See the LA County Planning REO Update page at: <https://planning.lacounty.gov/long-range-planning/reo-update/>. As part of the REO Update process, LA County Planning has been hosting public outreach meetings to solicit input on various renewable energy technologies and BESS. On June 17, 2025, LA County Planning hosted a community meeting to discuss siting considerations for BESS technologies. The slide presentation and video recording of this community meeting (including oral comments) is available at the following link: <https://planning.lacounty.gov/long-range-planning/reo-update/events/>.

Application Subsection 3.6 must be updated to acknowledge Los Angeles County's current planning efforts specific to utility-scale BESS and other electric infrastructure such as transmission. Staff recognize that Los Angeles County's development standards for renewable energy generation and BESS are currently undergoing revisions that will be included in the REO Update. CEC land use staff will coordinate directly with LA County Planning to remain informed of these proposed revisions throughout the Opt-In process.

DR LAND-2. Per California Code of Regulations, title 20, Appendix B (g) (3) (A) (ii) and Appendix B (g) (3) (B), discuss the project's conformity with the Los Angeles County BOS motions issued in December 2023 and April 2024. This discussion should acknowledge and discuss the County's current efforts to update its REO.

California Code of Regulations, title 20, Appendix B (g) (3) (A) (iv) requires the application to include legible maps of the areas identified in subsection (g) (3) (A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.

The Application includes Figure 3.6-4, Existing Zoning (TN 264413), which illustrates

the Los Angeles County zoning designations for the project site and surrounding area. However, staff reviewed Los Angeles County's online zoning code map (Z-NET) and determined that the project site's zoning layers illustrated in Figure 3.6-4 are incorrect. Figure 3.6-4 suggests that the entire project site is zoned A-1-2 (Light Agricultural). According to Z-NET, the northeastern portion of the project site contains parcels that are zoned A-2-2 (Heavy Agricultural). Furthermore, Figure 3.6-4 does not identify the Acton CSD or the Santa Clara River SEA, which are zoning districts applicable to the project site. Figure 3.6-4 in the application must be updated to reflect the correct zoning designations and identify the overlay districts.

DR LAND-3. Per California Code of Regulations, title 20, Appendix B (g) (3) (A) (iv), provide an updated Figure 3.6-4 that illustrates the correct zoning designations and identifies the Acton Community Standards District and the Santa Clara River SEA.

California Code of Regulations, title 20, Appendix B (g) (3) (C) requires the application to discuss the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, the application must describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single legal parcel.

Application section 1.4 (TN 264413) states that "...[t]he Applicant, or its affiliates, has site control of the BESS site including the Southern Gen-Tie Route." Application subsection 3.6.7 (TN 264413) further states that "...[l]ot line adjustment or merger may not be appropriate or feasible because the parcels under site control do not have a common owner." Because the parcels under site control do not have a common owner, CEC staff assume that the applicant has entered into separate lease agreements with each of the parcel owners within the project site. To confirm that the applicant has site control for the entire project site throughout the anticipated 40-year life of project, staff require further information regarding the terms and conditions of each lease agreement.

DR LAND-4. Per California Code of Regulations, title 20, Appendix B (g) (3) (C), provide documentation of site control for each of the parcels within the project site. Documentation can include a copy of each lease agreement and/or a table identifying the terms and conditions of the lease agreement for each parcel within the project site, including timeline for execution of lease agreement, duration of lease agreement, and lease renewal timelines.

California Code of Regulations, title 20, Appendix B (i) (2) and Appendix (B) (i) (3) require the name, title, phone number, address (required), and email address (if known), of an official who was contacted within each permitting agency, as well as a schedule of when permits outside the authority of the commission will be obtained.

Application subsection 3.6.6, Table 3.6-3 (Permits and Agency Contacts) (TN 264413), identifies the applicable land use permits and agency contacts for the project. However, some agency contact information is missing from Table 3.6-3. CEC requests an update to Table 3.6-3 that includes all required contact information for each of the permitting agencies applicable to the project. If permitting by an agency is not applicable to this project, the inapplicability should be stated.

DR LAND-5. Per California Code of Regulations, title 20, Appendix B (i) (2) and Appendix (B) (i) (3), please update Table 3.6-3 (Permits and Agency Contacts) to include a contact name and phone number for each permitting agency that is applicable to the project. Where an agency permit is not applicable, please note it as such.

PALEONTOLOGICAL RESOURCES

Appendix B (g) (16) (B) requires a discussion on the paleontological sensitivity of the geologic units. Discussion of geologic units in Section 3.8 Paleontological Resources, subsections 3.8.1 and 3.8.2 of the application address late Pleistocene dissected surficial sediments but does not mention the Holocene deposits. No rationale was provided on how the Holocene units were assigned a sensitivity rating.

DR PAL-1. Please provide more detail on the Holocene units and why they have a low sensitivity rating.

Appendix B (g) (16) (D) requires occurrences of fossil finds within a 1-mile radius of the project to be mapped and submitted as a confidential document to the commission. Appendix 3.8A identifies fossil finds near the project site in text but does not present the data geographically.

DR PAL-2. Please present the data on a map at the required scale and scope. If the fossil finds are outside of a 1-mile radius from the project, make it clear in the text that they are as such.

PROJECT DESCRIPTION

California Code of Regulations, title 20, Appendix B (b) (1) (C) requires a detailed description of the design, methods of construction (include depth of excavations and other ground disturbances) and operation. Section 2 Project Description, subsection 2.3.1.1 notes that the project will implement an augmentation strategy to maintain the contractually required capacity of the system as the battery cells will naturally degrade over time. Augmentation is described as entailing either a capacity maintenance approach of adding/replacing individual battery modules in the existing BESS yard or designing the BESS system to incorporate space for additional BESS enclosures for later augmentation. Table 2-8 includes one way vehicle trips, and a list of equipment used for battery enclosure/power conversion system installation with a note that the table includes augmentation assumptions.

DR PD-1. Please identify the augmentation assumptions used for preparing the environmental analysis.

PUBLIC HEALTH

The applicant mentions in Section 2.3 Public Health, subsection 2.3.1.9 that the BESS units are fully certified to the most rigorous international safety standards including UL 9540A - Standard Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems. Staff requests supplemental information to further assist the CEC staff and the public in their review of the air quality and public health impacts during any battery thermal runaway/fires.

DR PH-1. Please provide a copy of the UL 9540A report(s), for the specific or multiple battery manufacturer(s) that have been chosen, including measured emissions of criteria air pollutants, toxic air contaminants (TACs), and greenhouse gases (GHG), including but not limited to carbon monoxide, carbon dioxide, benzene, particulate matter, metals, hydrogen chloride, hydrogen fluoride, and hydrogen cyanide.

DR PH-2. Please provide the exact locations (latitude and longitude or UTM coordinates) and physical dimensions of the BESS enclosures for modeling purposes. Additionally, for dispersion modeling of all potential criteria air pollutants, GHG, and TACs that may be released during combustion events, please provide the following input parameters:

- Emission rates
- Exhaust temperature
- Exhaust diameter
- Exhaust pressure
- Exhaust gas velocity

Please also provide detailed calculations and justification for parameters used in the calculation of the air pollutant density values. In addition, include the total number of battery cells per module and per unit, and attach the calculation worksheet if available.

DR PH-3. Please provide a dispersion modeling analysis of all potential criteria air pollutants and TACs for the thermal runaway/fire scenario using a well-validated model (AERMOD and HARP2 preferred).

DR PH-4. Please compare the modeled fire-related TACs concentrations to the Office of Environmental Health Hazard Assessment (OEHHA) /California Air Resources Board (CARB) 1-hour acute Reference Exposure Levels (RELs) and demonstrate whether the acute hazard Index (HI) of TACs would be higher than the significance threshold of 1.0 at sensitive receptors. If an OEHHA 1-hour acute REL is

not available, a level 1 U.S. EPA Acute Exposure Guideline Level (AEGL) shall be used as the threshold of significance. Please demonstrate whether the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards. If exceedances occur, provide a detailed Emergency Response Plan and outline the applicable regulatory notification requirements.

SOCIOECONOMICS

California Code of Regulations, title 20, Appendix B (g) (7) (A) (iv) requires the application include the capacities, service standards, existing and expected use levels and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, parks and recreation facilities, libraries, and other public facilities.

Section 3.10 Socioeconomics, subsection 3.10.1 of the application (TN 264413) includes a discussion of utilities, fire protection, law enforcement, emergency response, medical facilities, and libraries. However, a discussion of the capacities, service standards, existing and expected use levels and planned expansion of park and recreation facilities was not included in the application.

DR SOCIO-1. Discuss the capacities, service standards, existing and expected use levels and planned expansion of parks and recreation.

California Code of Regulations, title 20, Appendix B (g) (7) (A) (v) requires the application include the potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste), and public services, including fire, law enforcement, emergency response, medical facilities and other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities.

Subsection 3.10.2 includes a discussion of potential impacts on utilities, fire, and law enforcement. The response times for law enforcement, fire, and emergency response are included in Subsection 3.10.1.

DR SOCIO-2. Discuss the potential impacts, including additional costs and ability to meet local service standards on medical facilities, parks and recreation, and libraries.

SOILS

Appendix B (g) (1) requires reference materials for the cumulative setting. Section 3.1 Soils, subsection 3.11.3 references SWPPP, DESCP, and Los Angeles County grading and building ordinances and requirements. The section does not reference the Los Angeles County General Plan.

DR SOILS-1. Please add a reference to relevant elements of the Los Angeles County General Plan that contain goals, policies, objectives, and/or actions regarding the mitigation of impacts to soils.

Appendix B (i) (2) requires detailed contact information on officials contacted within permitting agencies involved in the project. Table 3.11-3 lists one required agency but does not a list specific contact beyond identifying the agency.

DR SOILS-2. Please provide contact information for an appropriate official at the Los Angeles County Public Works Agency.

TRAFFIC AND TRANSPORTATION

In Section 3.12 Traffic and Transportation, subsection 3.12.3.2, the applicant provides a Vehicle Miles Traveled (VMT) estimate for the construction phase but does not include any explanation of how this estimate was calculated. Additionally, Table 3.12-3, which is referenced for context, is not included in the Transportation section.

DR TRANS-1. Please provide the referenced Table 3.12-3 and identify whether Project related VMT during construction exceeds the County's standard. In subsection 3.12.2.1 page 3.12-7, the applicant states that level of service (LOS) is used to measure impacts for residential streets, yet in the Intersection LOS with construction Traffic (Table 3.12-12), the analysis is based on delay and queue lengths rather than LOS grades at Intersection 1 and 3. This approach appears to be based on labeling Sierra Highway as a major Highway; however, according to Table 3.12-6 (Roadway Classification), Sierra Highway does not meet the criteria for a major highway as it has a total of 4 lanes. Major highways are defined as 6-8 lanes in the report.

DR TRANS-2. Address why queue length was used as the primary metric to assess construction impacts rather than LOS, given Sierra Highway's classification. Identify and explain if another source was referenced to classify Sierra Highway. Reevaluate if queue lengths are the appropriate metric.

In the Caltrans Facilities Analysis (Table 3.12-12), the northbound right-turn (NBR) queue lengths at Intersection 1 for the 95th percentile do not exceed the storage length for the Existing plus Project Conditions. However, according to Appendix A, Part 4 – Turning Movement Performance, the NBR storage bay is 55 feet, which would mean the reported queue exceeds this length.

DR TRANS-3. The gore point (triangular area between through lanes and an off ramp or two merging roadways) is used as the storage length reference for both NBR and NBL (northbound left) movements at Intersection 1. However, the appendix identifies 55 feet as the NBR storage bay. Please explain why storage bay length reported in Appendix A was not used to evaluate queue impacts when that is the parameter set in SimTraffic.

California Code of Regulations, title 20, Appendix B (g) (5) (F) requires the application include a discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.

DR TRANS-4. Provide a discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.

TRANSMISSION SYSTEM DESIGN

For the identification of impacts on the transmission system and the indirect or downstream transmission impacts, staff relies on the Phase I and Phase II Interconnection Studies to ensure the interconnecting grid meets the California Independent System Operator (California ISO) reliability standards. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards. When the studies determine that the project will cause a violation of reliability standards, the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include the construction of downstream transmission facilities. CEQA requires the analysis of any downstream facilities for reasonably foreseeable indirect impacts of the proposed project. Without a complete Phase I or Phase II Interconnection Study, staff is not able to fulfill the CEQA requirement to identify the indirect effects of the proposed project.

Complete descriptions of the project transmission and interconnection facilities are also required to determine whether the project, as proposed, would comply with California

Public Utilities Commission (CPUC) General Order (GO) 95, 128 and 131-D construction standards. Therefore, please provide following information:

DR TSD-1. Please provide detailed SCE Vincent Substation one-line diagram with the proposed project interconnection. Show all equipment ratings including bay arrangement of the breakers, disconnect switches, buses, generator tie-line, line rating, and other equipment.

DR TSD-2. Please clarify the overhead generator tie-line information. The overhead gen-tie line name, type, size, and current carrying capacity provided in Subsection 2.3.2 of the Application is different from what is provided in Figure A.1 of the Appendix A – Q1625 Queue Cluster 12 Phase II Report.

DR TSD-3. Please clarify the overhead gen-tie line length. The length of the gen-tie line provided in Section 2 Project Description, subsection 2.3.2 is different from what

is provided in Figure A.1 of the Appendix A – Q1625 Queue Cluster 12 Phase II Report.

DR TSD-4. Please explain the information provided in Section 2 Project Description, Table 2-3. Please provide the “conductor” name, type, size, and current carrying capacity; purpose and location of the “conductors”.

1. 500 kV Gen-tie Line: Applicant Owned: North: 3500 ft long / South: 7300 ft long, Southern California Edison (SCE) Owned: 2800 ft long.
2. Conductors: Applicant Owned: North: 30800 ft / South: 63000 ft, SCE Owned: 16000 ft.

DR TSD-5. Please resubmit Section 2.0 “Project Description Appendices 3 of 4 in separate files. The file is too large to open. Please resubmit under separate files such as, but not limited to, as below:

1. QC 12 Phase II Interconnection Study Report SCE Northern Area Report
 - a. Appendix and attachments
2. QC 12 Phase II Appendix A-Q1625
 - a. Appendix and attachments
3. Affected System Studies
4. 2022 Generator Reassessment Report
5. 2022 Generator Reassessment Report Q1625
6. Large Generator Interconnection Agreement

Staff needs to determine whether the project would cause transmission line overloads which might require transmission line reconductoring or other significant downstream transmission upgrades.

If it has been determined that reconductoring or other downstream upgrades are needed, these upgrades would need to be included in a CEQA analysis.

WASTE MANAGEMENT

Section 3.14 Waste Management, subsection 3.14.2.3.1, page 3.14-7 states that lithium batteries may be considered hazardous waste in California when discarded. However, page 3.14-8 of the Application states that “*Batteries and other equipment and materials will be recycled to the extent feasible to minimize disposal in landfills*”.

Appendix 2F, Draft Decommissioning Plan, Subsection 5.2.1.1, page 12 of the Application mentions 32 lithium battery recycling facilities worldwide, with 4 of those in North America, and 5 additional plants planned for the United States and Mexico. While certifying projects that include BESS, it has been CEC staff’s experience that the public is concerned with the final condition of lithium batteries at the conclusion of the project.

DR WASTE-1. Since California has prohibited disposal of lithium batteries in Class III landfills as of 2006, please revise the statement on page 3.14-8 to clarify that Class III landfills will not be used for lithium battery disposal during decommissioning.

DR WASTE-2. Although the options for recycling lithium batteries may change in the future, please indicate at this time, the most likely facility for recycling lithium batteries during decommissioning in subsection 5.2.1.1 in the Draft Decommissioning Plan.

WATER RESOURCES

Appendix 3-15A, Attachment J, Hydrology Study (TN 264384), is missing pages 3-5, which are supposed to include existing and proposed conditions, as well as surface runoff modeling and flood analysis results, as required by California Code of Regulations, Title 20, Appendix B (g)(14)(B)(ii).

DR WATER-1. Please submit a complete version of the hydrology study to the project docket.

California Code of Regulations (CCR) Title 20, Appendix B (g) (14) (C) (ii) requires the physical and chemical characteristics of the water supply source to be described. However, Table 3.15-2 of the application only includes concentrations of nitrates for four of the eight local wells listed and total dissolved solids (TDS) for one well.

DR WATER-2. Please submit a full suite of general water chemistry and organic compound analytical results for existing local wells.

Septic System

Several instances in the application note that the operations and maintenance (O&M) building will be serviced by a septic system to process sanitary wastewater (Section 2 Project Description, subsection 2.3.1.10, Section 3.6 Land Use, subsection 3.6.2.3.1, Section 3.10 Socioeconomics, subsection 3.10.1.7.3 and Section 3.11 Soils, subsection 3.11.2.3.4). However, some of these references are contradictory. In particular, Appendix 2A, drawing PSR-SE-101, depicts a leach field near the proposed O&M building, while Section 3.16 Wildfire, subsection 3.16.2.3.3, describes a septic tank to be periodically pumped out for off-site disposal.

DR WATER-3. Please clarify whether the proposed septic system will be a leach field system, or a septic tank with periodic offsite disposal.

Subsection 2.3.1.10 indicates the facility will contain a septic system to service the O&M building. Drawing No. PSR-SE-101 (App 3-15A Water Quality Management Plan Part 1) depicts a septic field in the upper eastern corner of the western underground storm water detention area. In accordance with California's 2022 Water Supply Strategy, an advanced onsite wastewater treatment system (OWTS) could be employed to treat

sanitary wastewater and use recycled water for non-potable applications, such as landscape irrigation. Please note that an advanced OWTS would require coverage under the Regional Board Order No. R4-2019-0024 "General Waste Discharge Requirements for Advanced Onsite Wastewater Treatment Systems".

DR WATER-4. Please evaluate if an advanced OWTS would be a feasible alternative to process sanitary wastewater from the O&M building.

Stormwater Management

Many of Appendix 2A design drawings (TN264409) depicting stormwater and erosion control features are not oriented consistently.

DR WATER-5. Please submit a revised version of Appendix 2A where all the design drawings are oriented in the same direction.

An incised ravine in the western portion of the proposed BESS facility, south of Soledad Canyon Road was noted as potential waters of the United States (NWW-1A) in the aquatic resources delineation (TN 264474). Appendix 2A, Grading and Drainage Plan, Drawing No. PSR-CS-004 S010 shows an existing culvert under Soledad Canyon Road leading to the ravine. Appendix 2A, Energy Dissipator Details, Drawing No. PSR-CS-010 depicts a pipe leading into the inlet box of the energy dissipator. However, there are no design plans showing a pipeline that diverts stormwater from the ravine under the southeast portion of the BESS facility.

DR WATER-6. Please provide design drawings and text that explains how stormwater from the ravine will be addressed if a pipeline under the southeast portion of the BESS facility is not used to convey stormwater from the ravine, or provide design drawings that depict the pipeline that connects with the inlet box of the energy dissipator.

Stormwater Industrial General Permit

Based on the Applicant's Standard Industrial Classification Codes 3691 and 5063, the project is not covered by State Board Order WQ 2014-0057-DWQ, as Amended By Order WQ 2015-0122-DWQ & Order WQ 2018-0028-DWQ.

DR WATER-7. Please indicate in the pertinent section of the application whether enrollment under this order is necessary.

Basin Plan, Water Quality Objectives and Beneficial Uses

Section 3.15 Water Resources, subsection 3.15.1.3.1 of the Application should include the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Los Angeles Basin Plan) and *Water Quality Control Plan for the Lahontan Region* (Lahontan Basin Plan), and the applicable groundwater quality objectives and beneficial uses for the Antelope Valley Groundwater

Basin. Please note that the project overlies the Antelope Valley Groundwater Basin, which is included in the Lahontan Basin Plan and managed by the Lahontan Regional Water Quality Control Board; however, the facility location is within the jurisdiction of the Los Angeles Water Board.

DR WATER-8. Please include a narrative in Subsection 3.15.1.3.1 describing the Los Angeles and Lahontan basin plans.

Dredge and Fill Permit Application

The Los Angeles Regional Water Quality Control Board (LARWQCB) conducted a review of the Clean Water Act Section 401 Water Quality Certification/Waste Discharge Requirements submittal as part of the Application for the Prairie Song Reliability Project (TN 264473 through TN 264475) and determined several elements were missing. Moreover, there are some contradictions in the Aquatic Resources Delineation Report (TN 264474, Attachment D) regarding the assessment of Federal and State review areas. Table 3, USACE Aquatic Resource Summary of the Aquatic Resources Delineation for the Review Area shows the same acreage as non-wetland waters of the state shown in Table 4, RWQCB Aquatic Resource Summary for the Review Area. In addition, on page 7, it is stated that “*Due to the arid conditions of the Review Area, non-wetland waters were delineated to the OHWM mark at the top of bank, if present.*” Furthermore, according to the LARWQCB, no application for dredge and fill waste discharge requirements has been received by their office.

DR WATER-9. Please provide the following items that appear to be missing from dredge and fill waste discharge requirements application:

- Receiving Water Body, Hydrologic Unit Code (HUC-12) per the Los Angeles Water Board’s Basin Plan (*reference the Chapter 2: Beneficial Uses Tables for the HUC & Appendix 1*)
- An aquatic resources jurisdictional delineation map and report that identifies the waters of the state jurisdiction.
- An impact area map (temporary and permanent areas should be clearly identified).
- Site-specific BMPs (narrative format).

Please note that an application fee per the Dredge or Fill Calculator is required with the LARWQCB application submittal and additional project fees need to be confirmed with the assigned LARWQCB staff. Also, a CEQA Notice of Determination Form/State Clearinghouse No. and CEQA documents will be required when available.

DR WATER-10. Please clarify the statement “*Due to the arid conditions of the Review Area, non-wetland waters were delineated to the OHWM mark at the top of bank, if present,*” since the top of bank is usually LARWQCB jurisdiction.

Please note that a site visit with LARWQCB staff will be necessary to confirm the delineation of the waters of the state for DR WATER-9 and DR-WATER-10. If the delineation needs to be updated, the permanent and temporary impacts should be recalculated.

DR WATER-11. Please submit an application for dredge and fill waste discharge requirements to the LARWQCB office, addressed attention Celine Gallon and cc Adam Taing.

Be advised that LARWQCB staff are available to clarify any questions regarding data requests DR WATER-9 through DR WATER-11.

WILDFIRE

The Application discusses an Emergency Response Plan (ERP) in Section 3.5 Hazardous Materials Handling on p. 3.5-14 and includes a template for the plan in Appendix 3.17C. However, the ERP lacks sufficient detail (the discussion is only one sentence long and the template is not project-specific).

DR WF-1. Please provide additional details for the ERP that includes at a minimum: how the plan would be applied during construction and operation, an outline of the information that would be included in the plan including any standard language regarding evacuation procedures.

WORKER SAFETY AND FIRE PROTECTION

Section 3.17 Worker Health and Safety, subsections 3.17.2.3.1 and 3.17.2.3.2 of the Application outline components of the Construction Health and Safety Program and the Operation Health and Safety Program, respectively. The application includes Table 3.17-5 listing Worker Health and Safety Laws, Ordinances, Regulations, and Standards (LORS). However, Table 3.17-5 does not provide a comprehensive list of critical LORS relied upon for the outlines of the Construction/Operation Health and Safety Programs as required by California Code of Regulation, title 20, Appendix B (i) (1) (A). Staff is not suggesting that all occupational safety and health LORS be discussed in detail, however, critical LORS must be explicitly listed and referenced. Furthermore, Table 3.17-6 does not specify the applicable permits as required by California Code of Regulation, title 20, Appendix B (i) (1) (B).

DR WS-1. Provide a revised Table 3.17-5 with specific section references to the Cal/OSHA regulation sections (Title 8 California Code of Regulations) for all programs outlined in Sections 3.17.2.3.1 and 3.17.2.3.2 for the Construction Health and Safety Program and the Operation Health and Safety Program, respectively.

DR WS-2. Provide a revised Table 3.17-5 with the correct reference to the California Fire Code requirements for electrical energy storage systems: Title 24, Part 9, Chapter 12, Section 1207.

DR WS-3. Provide a revised Table 3.17-5 with a comprehensive list of NFPA standards relied upon for the project's fire suppression systems e.g. NFPA 22, 24, 850, 855, etc.

DR WS-4. Provide a table of applicable state and local agencies with jurisdiction to issue permits, and a list of the specific permits, for worker health and safety, and fire extinguishing and fire suppression systems during construction and operations.

California Code of Regulations, title 20, Appendix B (g) (11) (C) requires draft outlines including for the Operation Health and Safety Program, Fire Prevention Plan (8 Cal. Code Regs., § 3221). Furthermore, California Code of Regulations, title 20, Appendix B (g) (11) (A) requires a description of safety training programs. The application Sections 3.17.2.3.2 includes outlines of the operations Fire Protection and Prevention Program. However, the outlines lack significant detail on project-specific potential fire hazards and control procedures as required by California Code of Regulations, title 20, section 3221.

DR WS-5. Provide a template for an Operations Fire Prevention Plan. Provide a discussion of project-specific potential fire hazards, control procedures, fire protection systems, etc.

DR WS-6. Provide a complete description of the proposed training programs for the Operations Fire Prevention Program and Emergency Response/Action Plan. Provide a discussion of proposed training provided to the operations personnel and the local first response agencies (fire department).

California Code of Regulations, title 20, Appendix B (g) (11) (C) requires draft outlines including for the Operation Health and Safety Program, Emergency Action Plan (8 Cal. Code Regs., § 3220). The application Section 2.3 estimates 2,035 BESS enclosures as part of the 70.8-acre BESS Facility portion of the project. Appendix 2A includes site plans specifically drawing number PSR-SE-101, General Arrangement, and drawing number PSR-BE-100, Typical BESS and MVT Elevation. However, the application does not provide detailed information on the placement and distribution of BESS enclosures across the parcels, especially between internal access roads.

Staff requires additional details on the BESS enclosure locations, setbacks, and internal access roads in order to verify that the project has proposed adequate project features to mitigate adverse impacts during an emergency response.

DR WS-7. Provide a complete description of the distribution of BESS enclosures, including a revised drawing number PSR-SE-101, General Arrangement. Specify the number of BESS enclosures between the two BESS yards (north and south) bisected by Soledad Canyon Road. Specify the number of BESS enclosure in each area separated by internal access roads. Specify the maximum BESS grouping size in terms of number of BESS enclosures.

DR WS-8. Provide a discussion of how the project design satisfies the Los Angeles County Fire Department (LACoFD) requirements for minimum separation and setback distances (on each side within any proposed BESS groupings; between adjacent groupings of BESS enclosures, in each direction; to the other types of nearest exposures). Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

California Code of Regulations, title 20, Appendix B (g) (11) (C) requires draft outlines including for the Operation Health and Safety Program, Emergency Action Plan (8 Cal. Code Regs., § 3220). Furthermore, California Code of Regulations, title 20, Appendix (g) (1) requires a discussion of the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Appendix 3.17C provides a template Emergency Response Plan with an example table of contents. However, the outlines lack significant detail on project-specific emergency procedures.

DR WS-9. Provide a discussion of the local emergency management agencies, unified program agencies, and local first response agencies that the applicant will coordinate with in developing the emergency response and emergency action plan.

DR WS-10. Provide a discussion of the anticipated response time by local first response agencies for incidents involving a BESS enclosure e.g. thermal runaway and fire. Provide a discussion of the fire response capabilities, EMS capabilities, and hazardous materials team for incidents involving a BESS enclosure.

DR WS-11. Provide a discussion of actions or proposed measures that the project could implement to mitigate impacts to the local first response agencies (fire department) due to an incident involving a BESS enclosure.

DR WS-12. Provide a discussion of the proposed remote monitoring capabilities, such as dedicated incident command center, thermal infrared cameras, air/water sampling plans, to aid the incident commander, local first response agencies, etc. during an incident involving a BESS enclosure.

California Code of Regulations, title 20, Appendix B (g) (11) (B) requires a complete description of the fuel handling system and the fire suppression system. Appendix 2A includes site plans specifically drawing number PSR-BE-201_S001, Fire Safety and Water Circulation Plan, and drawing number PSR-SE-101, General Arrangement. However, some text is not legible on drawing number PSR-BE-201_S001. Project features shown on drawing number PSR-SE-101 include the water tank, pump enclosure, and back-up generator pad at each BESS yard, as well as the existing well indicated at the south BESS yard. The application Sections 2.3.1.3 and 2.3.1.10 also describe a 26-foot-wide underground corridor under Soledad Canyon Road for a water line.

Staff requires a complete description of the locations of the project features related to the fire extinguishing and fire suppression systems.

DR WS-13. Provide a complete description of the underground corridor including a description of all the proposed utilities within the corridor. Provide a schematic and complete description of the route of the fire water line.

DR WS-14. Provide a higher resolution drawing number PSR-BE-201_S001, Fire Safety and Water Circulation Plan, with legible text for project features, including the locations of fire water line, fire water storage tanks, fire pumps, fire hydrants, etc.

California Code of Regulations, title 20, Appendix B (g) (11) (B) requires a complete description of the fuel handling system and the fire suppression system. The application Section 3.17.2.4 describes the water-based fire protection system for the project as a traditional water fire suppression system used to prevent the spread of fire to surrounding equipment. However, the application does not provide detailed information on the fire extinguishing and fire suppression systems for the O&M building and the BESS enclosures.

Staff requires additional details for the project's proposed fire extinguishing and fire suppression systems in order to verify that the project has proposed adequate project features to mitigate adverse impacts to operations personnel, emergency first responders, and the public. Staff requires complete descriptions of project features. A complete description specifies information including, but not limited to, the location(s) of project features, the specific listings and design standards, the more stringent local fire department requirements, and all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.

DR WS-15. Provide a schematic and complete description of the proposed fire suppression systems for all project buildings, including the two O&M buildings, pump enclosure, control building, etc.

DR WS-16. Provide a schematic and complete description of the proposed fire suppression system (e.g. water-based, gaseous, etc.) for the representative BESS enclosure.

California Code of Regulations, title 20, section 1704 (a) (3) (A), requires descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. California Code of Regulations, title 20, section 1704 (a) (3) (B), also requires the description to include the methodologies and findings of all major studies or research efforts undertaken and relied upon to provide information for the document. Subsection 3.17.2.4 of the Application references Appendix 3.17A which includes a water supply analysis for various exposure hazards. The analysis concludes the two (2) 40,000-gallon water supply tanks would provide an initial water supply for

up to five hours from a single 1 3/4-inch handline flowing at 125 gallons per minute (gpm) for cooling exposures, controlling smoke, or extinguishing small vegetation fires during a representative BESS enclosure fire event. However, the analysis does not provide references for the 125 gpm flow other than mentioning “based on typical firefighting tactics and procedures.”

DR WS-17. Provide a discussion on the fire flow assumptions (125 gpm) for the representative SunGrow PowerTitan 2.0 Container Fire. Provide descriptions of all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

DR WS-18. Provide a discussion of the estimated 15,000 gallons of water supply for the project’s external exposures (vehicle exposure fire and the transformer exposure fire). Provide the project’s worst-case fire flow requirements in GPM (gallons per minute).

California Code of Regulations, title 20, Appendix (g) (1) requires a discussion of the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. The Application at section 3.17.2.4 states “During these initial 5 hours, a shuttle service can be set up by the fire service to provide additional water to the site if it is required.” However, the application does not provide proposed measures if additional water is required by the fire service.

DR WS-19. Provide a complete description of the proposed measures for supplying additional fire water supply during extended emergency conditions.

California Code of Regulations, title 20, section 1704 (a) (3) (A), requires descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. California Code of Regulations, title 20, section 1704 (a) (3) (B), also requires the description to include the methodologies and findings of all major studies or research efforts undertaken and relied upon to provide information for the document. Furthermore, California Code of Regulations, title 20, Appendix (g) (1) requires a discussion of the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. The application describes the representative BESS enclosure as the Sungrow Power Titan II, with a lithium iron phosphate battery technology. Section 3.17.2.4 states a Hazard Mitigation Analysis (HMA) will be prepared per NFPA 855 and implemented during project operations. Appendix 3.17B provides a template HMA with an example executive summary and table of contents. Appendix 3.17A and 3.17D reference the UL 9540A cell level, module level, and unit level test results for the representative BESS enclosure.

Staff requires the hazard mitigation analysis to assess the hazards and impacts associated with the selected representative BESS enclosure.

DR WS-20. Provide the Safety Data Sheets for hazardous materials contained in the representative BESS enclosure, including related to the fire suppression system, air-cooled or liquid-coolant air conditioning system, and potential toxic vapors/emissions.

DR WS-21. Provide the UL 9540A cell, module, and unit level test reports for the representative BESS enclosure, Sungrow Power Titan II.

DR WS-22. Provide a complete description of how the Hazard Mitigation Analysis will comply with the California Fire Code section 1207.1.4 and the LACoFD requirements.

DR WS-23. Provide the Hazard Mitigation Analysis for the representative BESS enclosure, Sungrow Power Titan II.

DR WS-24. Provide a history of failure incidents utilizing the Sungrow Power Titan II technology. Provide a complete description of the proposed measures to prevent failure incidents for the proposed project.

California Code of Regulations, title 20, Appendix B (g) (11) (B) requires a complete description of the fuel handling system and the fire suppression system. The Application at subsection 3.5.1.2.2 describes the use of diesel fuel for emergency operations. The application Table 3.5-2 lists diesel fuel and lead-acid storage batteries for emergency generators and backup power source for control equipment, respectively. However, the Application does not provide detailed information on the fuels required by emergency and standby power systems.

DR WS-25. Provide a schematic and complete description of the emergency and standby power systems, including what they serve, by what means, and the duration of these systems for each required load e.g. exhaust ventilation, gas detection systems, etc.