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RESPONSES TO CEC DATA REQUEST SET 1

Vernon Backup Generating Station (25-SPPE-1)

SUBMITTED TO: CALIFORNIA ENERGY COMMISSION

SUBMITTED BY: **GIC Vernon, LLC**

August 2025

DAYZEN LLC

INTRODUCTION

Attached are GIC Vernon, LLC's responses to California Energy Commission (CEC) Staff Data Request Set No. 1 for the GEP Vernon Backup Generating Facility Application for Small Power Plant Exemption (SPPE) (25-SPPE-01). Staff issued Data Request Set No. 1 on June 23, 2025.

The Data Responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as Staff presented them and are keyed to the Data Request Numbers. Additional tables, figures, or documents submitted in response to a data request (e.g., supporting data, stand-alone documents such as plans, folding graphics, etc.) are found in Attachments at the end of the document and labeled with the Data Request Number for ease of reference.

For context, the text of the Background and Data Request precede each Data Response.

GENERAL OBJECTIONS

GIC Vernon, LLC objects to all data requests that require analysis beyond which is necessary to comply with the California Environmental Quality Act (CEQA) or which require GIC Vernon, LLC to provide data that is in the control of third parties and not reasonably available to GIC Vernon, LLC.

In addition to the general objection discussed above, it appears that in some cases the Staff has applied the same standards identified in Appendix B strictly to the review of this SPPE Application. During the regulatory change where the information required for an SPPE Application was merged into Appendix B, Staff assured applicants that not all of the requirements identified in Appendix B would be strictly applied to SPPE Applications. Specifically, those requirements that are necessary for an analysis of compliance with all applicable laws, ordinances, regulations and standards (LORS) are not necessary to perform a CEQA analysis. For an SPPE Application, Staff is attempting to determine whether the project will have significant environmental impacts, is designated as the lead agency under CEQA, and is preparing a CEQA document. The LORS analysis required for an Opt-In Application or an AFC is not required for the preparation of CEQA document. For this reason, in those specific areas where Staff is requesting a list of all agencies with LORS enforcement requirements and a listing of all LORS requirements, GIC Vernon is not providing that analysis and instead responding consistent with the CEC's granting of the last several years of SPPE Applications.

Notwithstanding these objection, GIC Vernon, LLC has worked diligently to provide these responses in sufficient detail to allow the CEC Staff to begin preparation of the CEQA document. In some cases, Staff has requested analyses that will take additional time than anticipated. Therefore, we have included these responses with notations for long

lead items that will be submitted under separate cover as Supplemental Data Responses when completed.

AIR QUALITY AND PUBLIC HEALTH

BACKGROUND: Air Quality Management District Application

The proposed project would require a permit from the South Coast Air Quality Management District (SCAQMD). For purposes of inter-agency consistency, staff needs copies of all correspondence between the applicant and the SCAQMD in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

DATA REQUESTS

DR AQ-1. Please provide copies of all substantive correspondence between the applicant and SCAQMD regarding the project, including application and e-mails, within one week of submittal or receipt. This request is in effect until staff publishes the environmental document.

RESPONSE TO DATA REQUEST AQ-1

Unlike an application to the CEC to certify a power plant where an air district prepare a preliminary determination of compliance during the CEC licensing process, for a data center requesting a SPPE, applicants do not file for any permits for emergency generators until after the CEC grants the SPPE. Therefore, there has been no correspondence with the SCAQMD nor is their likely to be any correspondence with the SCAQMD until after the CEC SPPE is granted. If there is such communication or correspondence, GIC Vernon will docket copies with the CEC.

DR AQ-2. Please identify the current schedule for the SCAQMD permit application submittal. Please submit a copy of that application to the docket when it is submitted to SCAQMD.

RESPONSE TO DATA REQUEST AQ-2

As described in Response to Data Request AQ-1, GIC Vernon will not file applications for emergency generator permits until the CEC grants the SPPE.

BACKGROUND: CalEEMod Construction and Operation Emission Calculations

The SPPE Application Appendix B (TN 262032), Air Quality, Public Health and GHG Technical Report, sub-Appendix AQ4, Construction Emissions and Support Data, is used to document CalEEMod emissions calculations. The analysis uses a prior version of CalEEMod (2020) that does not include EMFAC2021 emission factors.

Staff needs the input and output files of the CalEEMod emissions calculations to complete the review.

DATA REQUESTS

DR AQ-3. Please provide the input and output files of the CalEEMod emissions calculations.

RESPONSE TO DATA REQUEST AQ-3

The input and output files for the revised construction analysis using CalEEMod Version 2022.1 was supplied to the CEC on August 28, 2025.

DR AQ-4. Please re-run the CalEEMod analysis with the 2022 CalEEMod version.

RESPONSE TO DATA REQUEST AQ-4

The construction emissions analysis for the GEP Vernon facility was re-run using the latest version of CalEEMOD 2022.1 (the current on-line version located at the following link: https://www.caleemod.com/).

The following comments apply to the inputs, outputs, and results of the revised analysis:

- Every possible effort was made to mirror the inputs from the previous analysis. In cases where this was not possible a slightly higher input value was used to maintain a conservative analysis for comparison.
- Table DR AQ4-1 included in Attachment DR AQ-4 shows the emissions comparison between the previous version, 2020.4, and the new version 2022.1.
- Version 2020.4 was previously used, as this is the version alluded to on the SCAQMD CEQA website per the following link: https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). This link directs the user to the CalEEMod download page for version 2020.4. Please note that the SCAQMD has notified ADI on 7/8/2025 that the link to version 2020.4 is no longer valid and is being updated by the CEQA IT team to reflect use of the online version.

It should be noted that although the revised output identifies emissions as “Unmitigated” the inputs used were clearly identified and chosen, based on the program choices, as “mitigated”. Examples of these inputs are as follows:

- All construction related equipment was identified as “Tier 4 Final”.
- Water suppression for fugitive dust was used onsite with the default control efficiency.

- Low-VOC coatings were specified for the building interior and exterior, as well as coatings used in the parking areas.

BACKGROUND: Enforceable Permit Conditions, Annual Operations

Emissions estimates assume no more than 50 hours per year per engine for testing overall. Air quality impact modeling also presumes that readiness testing would be limited to occur within certain hours of the day (between the hours of 7 AM and 5 PM). Short-term impacts are shown on page 4.3-20, Table 4.3-11 of the SPPE Application emissions from one hour of testing of eight engines in one day. These daily emission rates would exceed the 55 lb/day SCAQMD NOx significance threshold. To remain below the 55 lb/day NOx threshold, testing could be limited to no more than four of the large QSK78 engines for no more than one hour per day.

The SPPE application shows certain assumptions for air quality impact analysis of the typical readiness and maintenance testing emissions that need to be verified. Assumptions in the analysis appear to include having no more than eight generators tested in a day, with no generator-engines tested concurrently. The modeling also assumes that the engine warmup time is 10 minutes (pages 4 and 5 of Appendix AQ1).

DATA REQUESTS

DR AQ-5. Please confirm that the applicant would request the SCAQMD to require an enforceable limit on concurrent testing of engines so that only a single engine operates for maintenance and testing at any given time, with a limit of four engines per day. If it is not feasible for the applicant to limit readiness testing to no more than four engines, for one hour or less, per day, please elaborate on why this would be infeasible, and what measures would be applied to keep daily NOx emissions below 55 lb/day.

RESPONSE TO DATA REQUEST AQ-5

The operational daily NOx threshold of 55 lb/day would be exceeded with the maximum potential testing of eight (8) engines at 100 percent load, each for one (1) hour per day. However, on an average day as is typically assessed with CEQA, the engines would be at a minimum load of 25 percent or less. Based on a typical day and not the worst case day, the daily emissions assuming a 30 minute warmup time and 30 minutes of controlled operation would result in a daily emissions level of 48.9 lbs/day of NOx, which would be less than the 55 lbs/day significance level.

It should also be noted that the SCAQMD has established daily emissions thresholds for construction and operation based on the attainment status of the SCAQMD basin with regard to air quality standards for specific criteria pollutants. Because the concentration

standards were set by the EPA at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks. The daily SCAQMD emissions thresholds are utilized to identify potentially significant impacts on air quality. For purposes of this type of analysis, an impact is considered significant if a project:

1. Generates total emissions (direct and indirect) in excess of the thresholds given in Table 4.2-3 of the SCAQMD CEQA Guidance.
2. Generates a violation of any ambient air quality standard when added to the local background.
3. Does not conform with the applicable attainment or maintenance plan(s).
4. Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million, and/or a health index (non-cancerous) greater than or equal to one.

This project directly modeled the emissions of NOx, both short term and annual and the project complies with the applicable air quality standards. No violations are expected to occur.

Thus, the project will not result in significant impacts for the daily operational emissions of up to eight (8) engines being tested. GIC Vernon agrees to request an enforceable condition that limits testing to no more than eight engines per day.

DR AQ-6. Please confirm that the applicant would request the SCAQMD to require an enforceable limit that would allow testing of standby engines only between the hours of 7 AM to 5 PM daily.

RESPONSE TO DATA REQUEST AQ-6

GIC Vernon will request the condition from the SCAQMD.

BACKGROUND: Screening for Low-load Conditions and Warm-up Period

In the SPPE Application, the applicant states "The engines could be operated over a range of load conditions from one (1) to 100 percent. Based on similar projects, the 100% load case always produces the maximum ground-based concentrations. Thus, an air quality screening analysis was not performed." The application also states, "The Applicant is not proposing a test schedule, i.e., hours versus load points but generally plans to test each generator one at a time. Testing will be done

based upon the Applicants judgment, taking into account the manufacturers recommendations, staff availability, and need.

Maintenance and readiness testing may occur at loads ranging from 25 to 100% load. For purposes of this application, emissions were assumed to occur at 100% load." However, in past projects, modelling has shown higher modeled operational concentrations at lower loads (75%, 50%, and 25%) for both PM10 and PM2.5. Staff needs to verify whether the Health Risk Assessment (HRA) results for these lower load cases exceed those for the 100% load case. Staff also needs to ensure that the health risks of the project during lower load cases would not exceed the SCAQMD Significance Thresholds.

The SPPE Application (TN 262029, p. 4.3-20) indicates that testing of the engines can occur over a range of load conditions. However, the analysis says that "an air quality screening analysis was not performed," and "…the worst-case stack condition and the worst-case engine location could be determined from the screening analysis" (TN 262029, p. 4.3-30). Staff needs a detailed description of the types of testing and maintenance scenarios, the frequency of full-load tests and low-load tests, and confirmation of impacts at various standby engine load points to verify the assumptions used in the SPPE analysis.

The applicant assumed that the 100 percent load case would produce the maximum ground-based concentrations (TN 262029, p. 4.3-30). In calculating the nitrogen oxides (NOx) emissions for the 100 percent load case, the applicant assumed a warm-up period of 10 minutes. For lower load cases (e.g., 100, 75, 50, 25, and 10 percent load), it may take more time for the selective catalytic reduction (SCR) to warm up. Staff needs to confirm whether the NOx emissions during lower load cases would be lower than those estimated for the 100 percent load case. If a Tier 4 emission factor is assumed for part of the hour for these load cases, the applicant needs to provide documents/certificates from the SCR vendor to verify the warm-up period of the SCR to reach Tier 4 emission rates for these load cases.

In addition, lower exhaust temperatures and slower exhaust velocities at lower loads could result in higher ground-level concentrations, even if the mass emissions would be lower. Without modeling, staff would not be able to confirm whether the ground-level impacts for the lower load cases would be lower than those for the 100 percent load case.

DATA REQUESTS

DR AQ-7. Please provide emission calculations for the uncontrolled and controlled load-specific emission rates covering the range of low-load points (i.e., 75, 50, 25, and 10 percent load).

RESPONSE TO DATA REQUEST AQ-7

Cummins, the engine manufacturer provided load emission points of 25, 50, 75 and 100 percent load(s). Since the background to the data request focused on warmup times for the SCR, the uncontrolled and partial controlled emissions (assuming a 30 minute warmup time) are presented below.

Cummins QSK78

Engine Load	NO_x Controlled lb/hr	NO_x Startup lb/hr	NO_x Uncontrolled lb/hr
100	4.895	24.48	44.059
75	3.672	18.36	33.046
50	2.448	12.24	22.034
25	1.224	6.12	11.012

Cummins QST30

Engine Load	NO_x Controlled lb/hr	NO_x Startup lb/hr	NO_x Uncontrolled lb/hr
100	1.634	8.17	14.703
75	1.226	6.13	11.032
50	0.817	4.08	7.351
25	0.409	2.04	3.681

Based on a 30 minute start period, the 1-hour NO_2 modeling was revised, with the results presented in the table below. The modeling utilized AERMOD in place of ARM2, the PVMRM ozone method was utilized with seasonal hour by day background included in the AERMOD input file. The seasonal hour by day data was obtained from the hourly data sets for the 1630 N. Main Street monitoring station in Los Angeles, which is the same monitoring station used in the application document. The seasonal hour by day data was for the three most recent years 2022-2024. PVMRM was selected based on the scheduling of only one engine tested during any one hour. The modeling results for the 1-hour CAAQS, with background, is 267.63 ug/m3, which shows compliance with the

state standard. The NO_2 modeling files were provided electronically to Staff on August 28, 2025.

DR AQ-8. Please provide NOx emission calculations for the representative range of engine load points (e.g., 100, 75, 50, 25, and 10 percent load). If a Tier 4 emission rate is assumed for part of the hour for these load cases, please provide documents/certificates from the vendor to verify the warm-up period of the SCR to reach Tier 4 emission rates for these load cases.

RESPONSE TO DATA REQUEST AQ-8

Please see the Response to Data Request AQ-7. The NO_x startup assumes a 30 minute warmup time, based on data provided by Cummins, which is a 20 to 30 minute warmup time period. The emissions guarantees are included in Attachment DR AQ-4.

DR AQ-9. Please provide a screening review of short-term (1-hour) ambient air quality impacts during testing for a representative range of engine load points (e.g., 100, 75, 50, 25, and 10 percent load) to confirm that full-load testing would produce the highest ground-level concentrations.

RESPONSE TO DATA REQUEST AQ-9

Please see Response to Data Request AQ-7 which includes the spreadsheet summary of the screening modeling analyses that demonstrates that at 25, 50, 75 and 100% loads for both the QSK78 and QST30 engines, the 100 percent load is the worst case. This also includes the modeling results of an assumed 30-minute warmup time for the SCR.

DR AQ-10. Please provide vendor documentation supporting SCR + DPF control effectiveness assumptions in achieving the Tier 4 emissions standards.

RESPONSE TO DATA REQUEST AQ-10

The documentation provided by the vendor is included in Attachment DR AQ-4.

DR AQ-11. Please elaborate on whether the engines could potentially be tested from a cold start to full load (100%) during any hour, and if not, please explain what steps could be taken by the owner/operator to avoid this type of full load test.

RESPONSE TO DATA REQUEST AQ-11

The engines could be tested from a cold start to 100 percent load and this would occur during the commissioning phase and is not the typical operation for testing. Testing will utilize a lower load with the full load testing limited to commissioning or emission source testing.

BACKGROUND: Ammonia Emissions

With the use of SCR to control oxides of nitrogen (NOx) emissions from the proposed engines, unreacted ammonia would also be emitted. Staff needs the ammonia emissions estimate to complete the analysis.

DATA REQUEST

DR AQ-12. Please disclose and quantify the potential ammonia emission rates and anticipated levels of ammonia slip during operation of the proposed backup generators.

RESPONSE TO DATA REQUEST AQ-12

The ammonia slip will be 10 ppm on both the QSK78 and QST30 engines. The mass emission calculations are presented below.

Ammonia Slip PPM to Lbs/Hr Calculation (for Turbines and IC Engines)

Engine ID:	**Cummins QSK78**		
Load Case, %:	100		
ACFM to DSCFM			
Stack ACFM	22293		CF
Stack Temp, F	863		0.400605
Stack % H2O	9	0.0900	0.9100
DSCFM	**8126.9**		

	STP, F	**ft3/lb-mol**	
	32	359.05	
	60	370.46	SCAQMD
	68	385.40	
	70	386.76	

PPM to Lb/Hr Conversion			
DSCFM:	8,126.9		
Stk % O2:	10	See note below.	
%O2 CF:	0.541		
Ft^3/lb-mol @ STP:	370.46	= factor:	3.70E+08

		NH3
Mol Wt.:		17.01
ppm @ 15% O2:	BACT Limit	10
ppm @ stk % O2:		18.5
Calculated Emissions at		**NH3**
Stack %O2, lbs/hr:		**0.41**

Note: %O2 from Catalytic Combustion Co. %H2O assumed as a reasonable value.

Engine ID:	**Cummins QST30**		
Load Case, %:	100		
ACFM to DSCFM			
Stack ACFM	7540		CF
Stack Temp, F	890		0.392593
Stack % H2O	9	0.0900	0.9100
DSCFM	**2693.7**		

	STP, F	**ft3/lb-mol**	
	32	359.05	
	60	370.46	SCAQMD
	68	385.40	
	70	386.76	

PPM to Lb/Hr Conversion			
DSCFM:	2,693.7		
Stk % O2:	10	See note below.	
%O2 CF:	0.541		
Ft^3/lb-mol @ STP:	370.46	= factor:	3.70E+08

		NH3
Mol Wt.:		17.01
ppm @ 15% O2:	BACT Limit	10
ppm @ stk % O2:		18.5
Calculated Emissions at		**NH3**
Stack %O2, lbs/hr:		**0.14**

Note: %O2 from Catalytic Combustion Co. %H2O assumed as a reasonable value.

BACKGROUND: Dispersion Modeling Details and Electronic Files

Staff needs the electronic versions of emissions estimating spreadsheets and model input/output files to fully review the analysis.

The SPPE Application, Appendix B, includes drawings of side elevations for engine enclosures showing "plenum extensions" (TN 262032, PDF pp.32-33), and these appear to indicate options for different engine stack heights. Staff needs to understand the different release parameters assumed for each of the proposed engines.

DATA REQUESTS

DR AQ-13. Please provide the output files for the health risk assessment (HRA) results that feed into Table 4.3-21 of the SPPE Application.

RESPONSE TO DATA REQUEST AQ-13

The input and output files for the revised analysis was supplied to the CEC on August 28, 2025.

DR AQ-14. Please provide the electronic files for the dispersion modeling and HRA.

RESPONSE TO DATA REQUEST AQ-14

The input and output files for the revised analysis was supplied to the CEC on August 28, 2025.

DR AQ-15. Please clarify stack parameters (e.g., stack height, exit temperature, stack diameter, and stack exit velocity) used in the HRA, and please confirm these are the final parameters that will be actualized in operation.

RESPONSE TO DATA REQUEST AQ-15

The applicant has clarified that the stack parameters listed in the application in Appendix AQ1 and in Tables AQ1-1 and AQ1-2 are correct. The drawings in Appendix B are generalized conceptual drawings (as noted) and are not reflective of the final design.

DR AQ-16. Please provide PM2.5 and PM10 concentrations at all receptors.

RESPONSE TO DATA REQUEST AQ-16

The modeling results for PM2.5 and PM10 reflect all receptors and are the same grids used in the NO_2, CO, SO_2 and HRA modeling runs. Full copies of the PM10 and PM2.5 modeling files are provided as noted in Response to Data Request AQ-14.

GREENHOUSE GAS EMISSIONS

BACKGROUND: Consistency with GHG Reduction Strategy

The SPPE Application Part I (TN 262029) includes discussion of consistency with some of the GHG reduction measures. However, the application does not demonstrate consistency with the following control measures from City of Vernon General Plan.

GP Policy R-1.2: Support the use of energy-saving designs and equipment in all new development and reconstruction projects.

GP Policy R-2.1: Coordinate and cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in efforts to implement the regional Air Quality Management Plan.

GP Policy R-2.2: Encourage and facilitate the use of public transportation to reduce emissions associated with automobile use.

Staff needs to know whether the project would implement these General Plan control measures.

DATA REQUEST

DR GHG-1 Please provide discussion of project features to ensure implementation for each component of the control measures/policies mentioned above.

RESPONSE TO DATA REQUEST GHG-1

With respect to GP Policy R-1.2, the cost of electricity service is one of the largest operational costs of the GEP. Consistent with its desire to minimize the costs of electricity provided to the GEP, GIC Vernon's PUE is below the nationwide average. The PUE is a measure of the building as a whole which is sufficient to establish compliance with GP Policy 1.2. Also, the SPPE Application contains a list of measures on pages 1-5 and 4.8-9 that are incorporated into the design of the GEP to achieve a lower than average PUE.

A discussion of GP Policy R-2.1 is provided in the SPPE Application at pages 4.8-9 and 10.

With respect to GP Policy R-2.2, GIC Vernon, LLC will encourage its employees to use nearby public transportation to reduce emissions associated with automobile use. The Vernon Metro A Line light rail station is located less than 1.5 miles from the project site, and a Metro Bus stop for Route 251 is located directly across Soto Street. These nearby public transportation resources offer viable alternatives to automobile use that GIC Vernon will promote to employees.

However, since the GEP's reconfiguring the site from a use that employed between 1800-2000 employees to one that has up to 30 employees, the change in use alone provides sufficient emission reductions from automobile use.

To clarify these measures, Table 4.8-4 is modified below.

Table 4.8-4: City of Vernon General Plan (GP) and Environmental Sustainability Action Plan (ESP) - Applicable GHG Reduction Policies

Policy	Project Consistency
GP Policy R-1.2: Support the use of energy-saving designs and equipment in all new development and reconstruction projects.	The average PUE will be 1.3, which is below the industry average PU. The GEP will include the following energy-saving measures: • Daylight penetration to offices • LED lighting fixtures and occupancy sensors • Reflective roof surface • Meet or exceed Title 24 requirements • Electric vehicle (EV) parking • Low flow plumbing fixtures • Landscaping would meet City requirements for low water use • Low GHG emission refrigerant in the project chillers • High efficiency critical electrical equipment • High efficiency HVAC equipment with economization features
GP Policy R-2.1: Coordinate and cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in efforts to implement the regional Air Quality Management Plan.	• The VBGF will comply with all applicable rules and regulations of the SCAQMD regarding emissions of criteria and toxic pollutants. • The proposed engines at the VBGF will comply with the applicable federal Tier 4 emissions standards for emergency standby electrical generation CI engines. • The VBGF will obtain and maintain all required air quality related permits from the SCAQMD, and requirements imposed by the California Energy Commission. • The GEP will implement BMPs to reduce criteria air pollutants during construction, • The GEP will comply with applicable regulations that would result in energy and water efficiency including Title 24 and California Green Building Standards Code,

Table 4.8-4: City of Vernon General Plan (GP) and Environmental Sustainability Action Plan (ESP) - Applicable GHG Reduction Policies	
Policy	**Project Consistency**
	• In addition, the project would not disrupt or hinder the implementation of applicable control measures in the 2022 Clean Air Plan.
GP Policy R-2.2: Encourage and facilitate the use of public transportation to reduce emissions associated with automobile use.	The GEP replaces a land use that generated automobile trips for 1800 to 2800 employees thereby significant reducing emissions associated with automobile use. IN addition, GIC Vernon LLC will encourage the use of public transportation by its employees.
ESP E1-a: Procure and deliver more renewable electricity to the grid.	GIC Vernon has proposed **PDM GHG-2** which would commit to either purchase 100 percent renewable electricity for use at the GEP or to participate in a program that achieves the same objectives for the GEP
ESP E2-a: Encourage building electrification and energy efficiency.	As described above, the GEP has been designed to minimize electricity use with a PUE less than the industry average and to incorporate energy saving features.
ESP T1-a: Reduce truck emissions of criteria air pollutants.	The GEP will have much lower truck traffic than the prior use.

BIOLOGICAL RESOURCES

BACKGROUND: Nitrogen Deposition Modeling

The Biological Resources section of the SPPE Application (TN 263302) did not include a discussion of nitrogen deposition impacts for the project's 40 diesel- fired backup generators. For siting projects, staff evaluates nitrogen deposition impacts by considering protected areas within a 6-mile radius of a project site.

These protected areas include California Department of Fish and Wildlife sensitive natural communities and U.S. Fish and Wildlife designated critical habitat. CEC staff has found that by the time the plume has traveled this distance, in-plume concentrations become indistinguishable from background concentrations. See California Code of Regulations, Title 20, Division 2, Chapter 5, Appendix B (g) (13) (B) (ii), Appendix B (g) (13) (C) (ii), Appendix B (g) (E), and Appendix B (g) (15) (B) (ii).

DATA REQUEST

DR BIO-1. Please perform nitrogen deposition modeling for the 40 diesel-fired backup generators (backup generators). The modeling should specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) for wet and dry deposition in special status species habitats and vegetation types. Please describe each habitat and species potentially affected by nitrogen deposition. Include the complete citation for references used (including the source document for documents not readily available online) in determining deposition rates and location. Provide modeled nitrogen deposition rates, map(s), and other information as specified for the project's backup generators. The response should also include a discussion of the potential for all anticipated emissions that may adversely affect soil-vegetation systems.

Alternatively, please provide justification regarding why the modeling is not warranted, which may include absence of designated critical habitat or sensitive natural communities with nitrogen-sensitive vegetation types within the 6-mile area potentially affected by the modeled nitrogen deposition plume.

RESPONSE TO DATA REQUEST BIO-1

Based on the biological resources documented in the project vicinity, nitrogen deposition modeling is not warranted for the GEP Vernon Backup Generating Facility project.

The biological survey area (BSA) does not overlap with any federally designated critical habitat and does not provide suitable habitat to support listed species. The U.S. Fish and Wildlife Service's Critical Habitat mapping indicates that the nearest designated critical habitat is for the coastal California gnatcatcher and is located more than 6 miles from the project. Desktop review and a reconnaissance-level field survey confirmed that the BSA

is entirely composed of urban and barren land cover types, with vegetation limited to ornamental plantings and disturbed non-native species. No nitrogen-sensitive natural communities, such as coastal sage scrub, vernal pools, or riparian woodland, were identified onsite or in the immediate vicinity.

While the California Natural Diversity Database records indicate occurrences of special-status species within a 10-mile radius, including nine sensitive plant species, nearly all are classified as extirpated, presumed absent, or having a low likelihood of occurrence due to the absence of suitable habitat. No special-status species were observed during the 2025 field survey.

Given the highly urbanized and industrial setting of the project area, which is dominated by impervious surfaces and heavily disturbed land and lack of designated critical habitats, nitrogen-sensitive communities, or viable populations of nitrogen-sensitive species in the area potentially affected by the project, nitrogen deposition is not likely to have a potential effect on any special status species habitats and vegetation types. Due to the low potential effect of nitrogen deposition from the project, modeling is not warranted for the GEP Vernon Backup Generating Facility project.

BACKGROUND: Biological Resources Technical Report (BRTR)

Staff reviewed the BRTR included in Appendix C (TN 263302) and determined that revisions and additional information consistent with requirements in Appendix B are needed where indicated in the data requests below.

DATA REQUESTS

DR BIO-2. Per Appendix B (g) (13) (D), please provide the name(s) and qualifications of the biologists who conducted the survey referenced in the BRTR.

RESPONSE TO DATA REQUEST BIO-2

See Attachment DR BIO-2 for the resumes of the biologists who conducted the survey referenced in the BRTR.

DR BIO-3. Per Appendix B (g) (13) (D), please provide copies of field survey forms completed by the applicant's biologist(s).

RESPONSE TO DATA REQUEST BIO-3

Copies of the field survey forms are contained in Attachment DR BIO-3.

DR BIO-4. Please provide GIS data (shape and/or geodatabase files) for all data mapped for biological resources.

RESPONSE TO DATA REQUEST BIO-4

The GIS data was provided to the CEC Staff via SharePoint on August 22, 2025.

CULTURAL AND TRIBAL CULTURAL RESOURCES

BACKGROUND: Updated Record Search Needed

The applicant's records search only covered 0.5 mile surrounding the project site, except due south and due east. The buffer employed for the proposed transmission lines comports with the requirements of Appendix B (g) (2) (B).

DATA REQUEST

DR CUL-1. Per Appendix B (g) (2) (B), please submit updated records search results extending to 1.0 mile for the area surrounding the project site to the southwest, west, northwest, north, and northeast.

RESPONSE TO DATA REQUEST CUL-1

Chronical Heritage is revising the Cultural Resources Inventory Report (CRIR) and will provide the updated records as requested in this Data Request in the final CRIR. GIP Vernon estimates the CRIR will be docketed on or before September 21, 2025.

BACKGROUND: Copies of DPRs and Reports Needed

The applicant did not provide copies of California Department of Parks and Recreation (DPR) 523 forms or reports from the record search results.

DATA REQUESTS

DR CUL-2. Please provide copies of DPR 523 forms for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search and updated literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, per Appendix B (g) (2) (B).

RESPONSE TO DATA REQUEST CUL-2

GIP Vernon, Chronical Heritage and Staff had a video conference call to discuss an alternative approach to evaluating structures 45 years or older along the potential transmission line routes. Vernon Public Utilities (VPU) provided an updated route map with the identification of pole locations. GIP Vernon and Chronical Heritage requested Staff consider limiting the DPR 523 forms to only those buildings that are adjacent to a pole location. This would still include analysis of over 70 buildings. GIP Vernon estimates the CRIR will be docketed on or before September 21, 2025.

DR CUL-3. Please provide copies of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project or which report on any archaeological excavations or architectural surveys within the literature search area per Appendix B (g) (2) (B). At minimum, these studies shall include LA-3268, LA-3408, LA-4834, LA-6357, LA-7842, LA-9113, LA-10593, and LA-12987.

RESPONSE TO DATA REQUEST CUL-3

The reports identified in the Data Request are being provided on or before September 21, 2025 to Staff via SharePoint link.

BACKGROUND: Survey Coverage Archaeology

The inventory report (Chronicle 2025) did not indicate if the archaeological survey included a 200-foot buffer from the project site or a 50-foot buffer from the proposed transmission line routes.

DATA REQUEST

DR CUL-4. Please acknowledge whether the archaeological survey included a 200-foot buffer from the project site, a 50-foot buffer from the proposed transmission line routes, or provide a reason why a buffer could not reasonably be surveyed per Appendix B (g) (2) (C).

RESPONSE TO DATA REQUEST CUL-4

The Revised CRIR will include the response to this data request and GIP Vernon estimates the CRIR will be docketed on or before September 21, 2025.

BACKGROUND: Survey Coverage Built Environment

The cultural technical report did not indicate if the survey included all buildings 45 years and older within one parcel of the project site and any project linear elements. Buildings 45 years and older within one parcel must be recorded and evaluated for significance on DPR 523 forms, per Appendix B (g) (2) (C). The cultural technical report identifies 11 properties that were recorded and evaluated, but Table 6-1, Historic Period Properties Description and CRHR Evaluation, includes a large number of properties within and along the area of the project with buildings 45 years old or older that were not recorded and evaluated for significance. The report states, "Only properties that were determined to retain integrity were recorded and evaluated as part of this investigation"; however, integrity is specifically related to the characteristics necessary to convey the significance of a cultural resource. Without evaluating the resource, integrity cannot be determined.

Several of the buildings listed in Table 6.1 have been demolished; these do not need to be recorded and evaluated. If any of these buildings are determined to be part of the Vernon Historic District, then they may be recorded as part of the district and do not require a separate standalone evaluation.

DR CUL-5. Please provide evaluations of all buildings 45 years and older within one parcel of the project and its linear elements on DPR 523 forms.

RESPONSE TO DATA REQUEST CUL-5

Please see Response to Data Request CUL-2.

BACKGROUND: Missing References

The survey report's References Cited section is missing several references from the body of the report.

DATA REQUEST

DR CUL-6. Please check all references in the body of the report and ensure they are included in the References Cited section of the report. Please add: Masters 2014, The City of Vernon 2012, Nials et al. 2013, Bright 1977, Reid 1926, Augustine Band of Cahuilla Indians; Ricardo Lopez 2019, and OHP 1990. In addition, please add the references from the CRHR Evaluation section to the References Cited.

RESPONSE TO DATA REQUEST CUL-6

Please see Response to Data Request CUL-1.

BACKGROUND: More Focused Prehistoric Context

Although the prehistoric context mentions Los Angeles County a few times, almost all of the references cited in the section focus on areas outside of Los Angeles County with most information focused on San Diego, the coast, and the Mojave Desert.

DATA REQUEST

DR CUL-7. Per Appendix B (g) (2) (A), please add to the prehistoric context an emphasis on the area no further than 5 miles of the project location citing relevant sources for information within the area in question. Consider the Alameda Corridor archaeological documents from the records search as you incorporate information of greater relevance to the project site.

RESPONSE TO DATA REQUEST CUL-7

Please see Response to Data Request CUL-7.

BACKGROUND: More Focused Ethnohistoric Context

The report does include the relevant tribes for the region (Gabrielino, Cahuilla, and Luiseno), however, the project area itself is located within the Gabrielino ancestral territory and is missing some key ethnographic information pertaining to the Gabrielino such as the Kroeber-documented village or community of Apachia, which is just to the northeast of Vernon.

DATA REQUEST

DR CUL-8. Please add a more in depth Ethnohistoric Context for the Gabrielino and include an emphasis on the area within a 5-mile radius of the project location per Appendix B (g) (2) (A).

RESPONSE TO DATA REQUEST CUL-8

Please see Response To Data Request CUL-1.

EXECUTIVE SUMMARY

BACKGROUND: Executive Summary, Site Exhibits

To thoroughly illustrate and present the project site and surroundings, staff needs several maps depicting current conditions.

DATA REQUEST

DR EXEC SUMM-1. To supplement the current Figure 1 (vicinity map) in the project application materials at Appendix A, Part I of II (TN 262031), please provide a map depicting the regional setting (1" = 2,000'), and a map of the project site (site plan) and its immediate surroundings (1" = 500'). The three exhibits together would comprehensively illustrate for staff the parcel and its place in the regional surroundings.

RESPONSE TO DATA REQUEST EXEC SUMM-1

See Attachment DR EXEC SUMM-1.

BACKGROUND: Executive Summary, Photographic Reproductions

To thoroughly depict and present the project site and surroundings, staff needs several illustrations depicting current conditions.

DATA REQUEST

DR EXEC SUMM-2. To supplement the current sheets A05-01 and A05-02 in Appendix A, Part I of II (TN 262031), of the project application materials consisting of colored artist exterior elevation renderings of the finished project, staff also requests a colored reproduction drawing of the site prior to construction.

RESPONSE TO DATA REQUEST EXEC SUMM-2

This figure is not necessary as the Project Site is currently vacant and a colored rendering of elevations is not possible.

BACKGROUND: Executive Summary, Project Parcel Identification Information

For proper identification of the parcel(s) for siting of the proposed project, staff requires precise location information, partly for other agencies tracking and identification systems.

DATA REQUEST

DR EXEC SUMM-3. Please provide identification information for all involved project parcels by section, township, range, and county, as well as assessor's parcel number.

RESPONSE TO DATA REQUEST EXEC SUMM-3

Staff has required identification of parcels by section, township, range and county for any of the SPPE Applications for data centers since 2018 and this level of information is simply unnecessary for Staff to prepare its CEQA documentation. The parcel numbers have been and continue to be sufficient.

BACKGROUND: Executive Summary, Property Owner's Mailing List, Map

Staff needs a map of parcels to accompany the list of parcel numbers, the map shall be for parcels within 1,000 feet of the site proper and parcels within 500 feet of linear project components (T-Line, water line, gas line, etc.). For parcels contiguous to the project site and linear features, direct mailing addresses for owners and occupants shall be provided.

DATA REQUEST

DR EXEC SUMM-4. The project application materials in Appendix I "Notice List" (TN 262058), needs to be supplemented with a map of parcels identified in the table of addresses/ parcels.

RESPONSE TO DATA REQUEST EXEC SUMM-4

Please see Attachment DR EXEC SUMM-4.

BACKGROUND: Executive Summary, Construction Schedule

Staff needs details of construction schedules for workload staffing, peaks, maximum number of workers, time of year, etc. The application indicates a full construction schedule is provided in Section 2.3.9; however, Section 2.3.9 is "Right of Way Improvements at Project Frontage" (TN 262029).

DATA REQUEST

DR EXEC SUMM-5. Please provide a comprehensive construction schedule and construction/operation narrative.

RESPONSE TO DATA REQUEST EXEC SUMM-5

The reference to the construction schedule is a mistake. It should have been Section 2.3.10 which provides a discussion of the construction schedule in sufficient detail for the Commission to evaluate the impacts for CEQA purposes and was sufficient to approve several SPPE Applications.

See General Objections above.

BACKGROUND: Executive Summary, Ownership

Staff needs ownership information to know who will be operating and have responsibility for the project generating facility and the transmission line.

DATA REQUEST

DR EXEC SUMM-6. Please provide a list of all owners and operators and their legal relationships for the proposed owners of the power plant facilities and the transmission lines.

RESPONSE TO DATA REQUEST EXEC SUMM-6

This information is provided in the Executive Summary page 1, footnote 1.

BACKGROUND: Executive Summary, Responsible Agencies

Staff needs to make provision to allow responsible agencies the ability to utilize a final exemption document.

DATA REQUEST

DR EXEC SUMM-7. Please provide a table that identifies each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified LORS, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, should the Commission exempt the facility from its exclusive authority to certify sites and related facilities. If no agencies with relevant jurisdictions exist, please state so.

RESPONSE TO DATA REQUEST EXEC SUMM-7

The only agency that would require use of the CEQA document prepared by the CEC is the SCAQMD. As described at page 4.11-3 of the SPPE Application, the City of Vernon does require a conditional use permit for the GEP and therefore, there is no discretionary action for which the City of Vernon requires use of the CEC's CEQA document.

GEOLOGY

BACKGROUND: Section 4.7 Geology and Soils of the main SPPE Application (TN 262029) contains footnote citations. However, a list of references for sources cited in these sections was not provided.

DATA REQUEST

DR GEO-1. Please provide a list of all literature relied upon or referenced in Section 4.7 Geology and Soils, related to geology and soils.

RESPONSE TO DATA REQUEST EXEC GEO-1

See Attachment DR GEO-1.

BACKGROUND: Subsection 4.7.2.1 Regulatory Framework includes descriptions of state laws, ordinances, regulations, and standards (LORS) related to geology and soils. However, descriptions of relevant regional and local LORS are required and not provided. Tables of agencies with permitting, leasing, and approval jurisdictions are required and not provided.

DATA REQUESTS

DR GEO-2. Please provide a discussion of relevant regional and local LORS related to geology and soils and are applicable to the proposed project. For example, please add relevant portions of municipal codes and general plans from the County of Los Angeles and City of Vernon.

RESPONSE TO DATA REQUEST EXEC GEO-2

As described in the General Objections above, a LORS analysis is not required for an SPPE Application and is not required to complete a CEQA document.

DR GEO-3. Please provide a table that lists LORS, adopted local, regional, state, and federal land use plans, leases, and permits that are related to geology and soils and applicable to the proposed project.

RESPONSE TO DATA REQUEST EXEC GEO-3

See response to Data Request GEO-2 above.

BACKGROUND: Additional information is required in subsection 4.7.2.2 Existing Conditions and Appendix 4-4A_Geotechncial Evaluation Part 1 to evaluate existing geologic conditions at the site and within two miles of the site.

DATA REQUESTS

DR GEO-4. Please expand the spatial extent of Figure 5 in Appendix 4- 4A_Geotechncial Evaluation Part 1 to show recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project.

RESPONSE TO DATA REQUEST EXEC GEO-4

As described in the General Objection above, such information is not required for a CEQA analysis.

DR GEO-5. Please add a description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project to Section 4.7 Geology and Soils.

RESPONSE TO DATA REQUEST EXEC GEO-5

As described in the General Objection above, such information is not required for a CEQA analysis.

BACKGROUND: As described in Appendix 4-4A_Geotechncial Evaluation Part 1, sediments that are potentially liquefiable, if saturated, underlay the project site. Figure 7 of that report shows the project is less than one mile from a CGS identified Liquefaction seismic hazard zone. Additional information is needed in subsection 4.7.2.2 Existing Conditions to evaluate existing geologic conditions at the project site.

DATA REQUEST

DR GEO-6. For the liquefaction potential analysis, a 1998 report (California Department of Conservation, Division of Mines and Geology, Seismic Hazard Report for the Los Angeles and South Gate 7.5 Minute Quadrangle, Los Angeles County, California, Plate 1.2 (SHZR 29 & 34) was used to estimate the historical high groundwater elevation. Please search more recent publicly available groundwater elevation sources to verify or revise the historical high groundwater elevation at the proposed project site.

RESPONSE TO DATA REQUEST EXEC GEO-6

GIC Vernon has requested this information from the consultant that prepared the Geotechnical Investigation and will supplement this response when the information is provided.

BACKGROUND: Additional information is required in subsection 4.7.5 Government Agencies.

DR GEO-7. If applicable, please provide the name, title, phone number, address (required), and email address (if known), of the staff at the County of Los Angeles who will serve as a contact person for CEC staff on issues related to geology and soils.

RESPONSE TO DATA REQUEST EXEC GEO-7

See General Objection above. The only agency with permit and code enforcement authority for the GEP is the City of Vernon.

PALEONTOLOGY

BACKGROUND: Section 4.7 Geology and Soils of the main SPPE Application (TN 262029) contains footnote citations. However, a list of references for sources cited in these sections was not provided.

DATA REQUESTS

DR PALEO-1. Please provide a list of all literature relied upon or referenced in Section 4.7 Geology and Soils, related to paleontological resources.

RESPONSE TO DATA REQUEST PALEO-1

See Attachment DR PALEO-1.

BACKGROUND: Subsection 4.7.2.1 Regulatory Framework includes descriptions of state laws, ordinances, regulations, and standards (LORS) related to paleontological resources. However, descriptions of relevant regional and local LORS are required and not provided. Tables of agencies with permitting, leasing, and approval jurisdictions are required and not provided.

DATA REQUESTS

DR PALEO-2. Please provide a discussion of relevant regional and local LORS related to paleontological resources. For example, please add relevant portions of municipal codes and general plans from the County of Los Angeles and City of Vernon.

RESPONSE TO DATA REQUEST PALEO-2

See the General Objection relating to LORS. There are no agencies other than the City of Vernon for permitting, leasing and approval of the GEP.

DR PALEO-3. Please provide a table that lists LORS, adopted local, regional, state, and federal land use plans, leases, and permits that are related to paleontological resources and applicable to the proposed project.

RESPONSE TO DATA REQUEST PALEO-3

See the General Objection above related to LORS.

DR PALEO-4. Please provide a table that identifies each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified LORS, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, should the Commission exempt the facility from its

exclusive authority to certify sites and related facilities. If no agencies with relevant jurisdictions exist, please state so.

RESPONSE TO DATA REQUEST PALEO-4

As stated in Section 4.7 of the SPPE Application, the only agency with permitting authority is the City of Vernon with the authority to enforce the building codes during issuance of the building permits for the project.

BACKGROUND: Additional information is required in subsection 4.7.2.2 Existing Conditions to evaluate paleontological resources at the project site.

DATA REQUESTS

DR PALEO-5. Please provide a discussion of the paleontological sensitivity of each geologic unit within two (2) miles of the project, as identified on the revised Figure 5 requested in **DR GEO-5**. Please provide rationale as to why each sensitivity was assigned.

RESPONSE TO DATA REQUEST PALEO-5

See Attachment DR PALEO-1

BACKGROUND: In subsection 4.7.2.2 Existing Conditions, the application states a records search did not return any paleontological resource sites in the City of Vernon. Staff notes that parts of the City of Vernon's northern and southern borders are less than one (1) mile from the project.

DATA REQUESTS

DR PALEO-6. Please clarify if the records search returned any paleontological sites within one (1) mile of the project site.

RESPONSE TO DATA REQUEST PALEO-6

See General Objection above. Strict adherence to the Appendix B requirements are not necessary for a CEQA analysis and this information has not been necessary for any of the SPPE Applications for data centers previously approved by the Commission and therefore is not needed by Staff

DR PALEO-7. If applicable, please provide the name, title, phone number, address (required), and email address (if known), of the staff at the County of Los Angeles who will serve as a contact person for CEC staff on issues related to paleontological resources.

RESPONSE TO DATA REQUEST PALEO-7

GIC Vernon does not believe that Staff needs to consult the County of Los Angeles as part of its review of the SPPE Application as there are no applicable permits necessary other than the City of Vernon building permits.

MINERALS

BACKGROUND: Section 4.12 Mineral Resources of the main SPPE Application (TN 262029) contains footnote citations. However, a list of references for sources cited in these sections was not provided.

DATA REQUEST

DR MINERALS-1. Please provide a list of all literature relied upon or referenced in and Section 4.12 Mineral Resources.

RESPONSE TO DATA REQUEST MINERALS-1

See Attachment DR MINERALS-1.

BACKGROUND: Subsection 4.12.2.1 Regulatory Framework includes descriptions of state laws, ordinances, regulations, and standards (LORS) related to mineral resources. However, descriptions of relevant regional and local LORS are required and not provided.

DATA REQUEST

DR MINERALS-2. Please provide a discussion of relevant regional and local LORS related to mineral resources. Specifically, please add relevant portions of municipal codes and general plans from the County of Los Angeles and City of Vernon.

RESPONSE TO DATA REQUEST MINERALS-2

See General Objection above. The project is entirely within the City of Vernon and as such the County of Los Angeles municipal code and general plan is inapplicable. Additionally, as stated in Section 4.13.3.2 the City of Vernon municipal code and general plan do not designate the site as a potential source of minerals.

HAZARDS AND HAZARDOUS MATERIALS

BACKGROUND: Location, Volume, and Refilling of the DEF Tanks

Section 2.2.10, Hazardous Materials Management, of the main SPPE Application (TN 262029) states that, "Diesel Exhaust Fluid (DEF) is used as part of the diesel engine combustion process to treat the exhaust gas and meet the emissions requirements. Each enclosure will have a 100-gallon DEF tank."

DATA REQUESTS

DR HAZ-1. Please provide an estimate of how often these tanks would need to be refilled during operation of the generators as well as the total volume of DEF to be stored on site.

RESPONSE TO DATA REQUEST HAZ-1

The 3 MW Generators have a 500-gallon DEF tank in this base design, with a worst-case consumption rate of 13.44 GPH, or just shy of 40 hrs runtime. The 1 MW Generators have a DEF consumption rate of 2.76 GPH and a default tank capacity of 50 gallon. Operationally, the re-fill of the DEF tanks will be scheduled to coincide with the re-fill the diesel tanks. Because the generator diesel tanks have 24 hour run time, the DEF tanks will be re-filled every other re-fill event. Therefore, there could be up to 19,100 gallons of DEF stored in the DEF tanks at one time. DEF can be stored onsite for up to three years when maintained properly.

DR HAZ-2. Please provide a discussion of the safety measures (including secondary containment) that would be undertaken to prevent spills or leaks during the filling of the DEF tanks during commissioning and operation of the project.

RESPONSE TO DATA REQUEST HAZ-2

DEF is not a hazardous material and therefore is not subject to hazardous materials storage criteria. DEF spills/ leaks during commissioning and operations are contained in a box at the point of connection. For leaks or spills that are large and may cause an overflow from the both there will be spill kits available on site to help absorb the liquid. GIC Vernon will employ the same procedure for immediate response and clean up for DEF it will use for fuel leaks. See page 2.2.10 of the SPPE Application.

BACKGROUND: CUPA Contact Information

Section 4.9.5, Governmental Agencies, states that, "The City of Vernon [Department of Health and Environmental Control (DEHC)] is the agency

responsible for regulating potential hazards discussed above under its Comprehensive Unified Agency Program (CUPA) status."

DATA REQUEST

DR HAZ-3. Please provide contact information (name, title, phone number, address, and email address) for an official who was contacted or can be a point of contact for CEC staff.

RESPONSE TO DATA REQUEST HAZ-3

The City of Vernon point of contact is Freddie Agyin Director, City of Vernon Department of Health and Environmental Control

Tel: 323.826.1448 Direct: 323.583.8811 x840

fagyin@cityofvernonca.gov

HYDROLOGY AND WATER QUALITY

BACKGROUND: Identifying Discharge Impacts Due to Construction and Operation

SPPE Application (TN 262029) section 4.10.3.3 states that "post-project flows will not exceed pre-project flows" because stormwater shall be treated using an underground stormwater biofiltration system but also proposes a significant increase in impermeable land surface.

DATA REQUESTS

DR HYD-1. Quantify the change in impermeable surface due to the project construction and operation.

RESPONSE TO DATA REQUEST HYD-1

See Attachment DR HYD-1 for an analysis from Langan showing the impervious change from the previous Slaughtering Facility to the proposed Improvements. Impervious area is proposed to be reduced from 11.48 acres to 9.93 acres.

DR HYD-2. Quantify the change in runoff due to project construction and operation and explain how it would be managed such that it would not exceed pre-project flow rates given the significant increase in impermeable areas.

RESPONSE TO DATA REQUEST HYD-2

See Attachment DR HYD-1 for an analysis from Langan showing the impervious change from the previous Slaughtering Facility to the proposed Improvements. Storm water runoff is proposed to change from 35.81 CFS to 32.7 CFS at 50-year Peak Flow Rate and therefore it would not exceed pre-project flow rates and the impermeable area has been reduced.

NOISE

BACKGROUND: Estimated Project Noise Levels

In Section 4.13.3.1 of the SPPE Application (TN 262029), the applicant provides predicted noise levels from the operation of HVAC equipment (Table 4.13-6) and from the simultaneous operation of 19 backup generators (Table 4.13-7).

However, the SPPE does not evaluate the testing scenario in which all HVAC equipment operates concurrently with the testing of a single backup generator (tested one at a time).

DATA REQUESTS

DR NOISE-1. Please provide the operational noise contour maps (in units of Leq) for the following two modes:

- normal mode, which assumes normal operating conditions, including operation of all HVAC equipment, without any of the gensets operating, and
- testing mode, which assumes testing one genset concurrently with the operation of all HVAC equipment at full load. For this mode, please consider testing of the genset that would result in the highest noise level at any receptor.

RESPONSE TO DATA REQUEST NOISE-1

Salter, Inc. has prepared a Revised Noise Report responsive to these data requests and is included in Attachment DR NOISE-1. The calculated noise levels for the testing scenario in which all HVAC equipment operates concurrently with the testing of a single backup generator is now listed in Table 7 of the Revised Noise Report.

DR NOISE-2. Please provide a noise contour map (in units of Leq) representing the aggregate construction noise levels during the loudest construction phase at any receptor.

RESPONSE TO DATA REQUEST NOISE-2

Salter, Inc. has prepared a Revised Noise Report responsive to these data requests and is included in Attachment DR NOISE-1. The requested noise contour map is now included in Revised Noise Report in Appendix B (Map 3).

DR NOISE-3. Please provide a map showing the exact receptor locations corresponding to the predicted operational noise levels in each of the four directions for each of the operational modes (HVAC operation, generator operation, and testing mode).

RESPONSE TO DATA REQUEST NOISE-3

Salter, Inc. has prepared a Revised Noise Report responsive to these data requests and is included in Attachment DR NOISE-1. The requested site maps indicating receiver locations evaluated for each analysis are now included in our Revised Noise Report and associated with the relevant tables (see Figure 2 and 3).

DR NOISE-4. Please provide a map showing the receptor points used for predicted construction noise levels at 50 feet and 200 feet from the source.

RESPONSE TO DATA REQUEST NOISE-4

Salter, Inc. has prepared a Revised Noise Report responsive to these data requests and is included in Attachment DR NOISE-1. The requested site map indicating receiver locations evaluated for each distance from the project site during construction is now included in our technical background report and associated with the relevant table (see Figure 4 of the Revised Noise Report).

BACKGROUND: Clarification On Analysis/Methodology

In Section 4.13.2.2 of the SPPE Application (TN 262029), the applicant provides only a range of ambient noise levels without hourly resolution, and it is unclear whether the reported values are in dB or A-weighted dB (dBA).

Additionally, the applicant uses the City of Vernon Municipal Code as the threshold of significance for operational noise impacts, without providing justification for selecting it over the City of Vernon General Plan noise policies.

DATA REQUESTS

DR NOISE-5. Please provide hourly average ambient noise levels in both Leq and L50 in dBA at each monitoring location.

RESPONSE TO DATA REQUEST NOISE-5

Salter, Inc. has prepared a Revised Noise Report responsive to these data requests and is included in Attachment DR NOISE-1. Hourly ambient noise levels are now provided in both Leq and L50 in Revised Noise Report (see Table 3 and Appendix B).

DR NOISE-6. Please explain the basis for using the City of Vernon Municipal Code as the noise threshold for assessing operational impacts, and clarify why the City of Vernon General Plan standards were not used instead.

RESPONSE TO DATA REQUEST NOISE-6

We focused on using the City of Vernon Municipal Code noise limits as the noise threshold for assessing operational impact because they are functionally stricter than the City of Vernon General Plan community noise standards. Nonetheless, we have included additional analysis comparing the expected operational noise levels to the City of Vernon General Plan noise standards (see the operational noise analysis of the Revised Noise Report on Pages 12 and 14). In addition, additional explanation has been added to the Analysis/Methodology section of the report on page 10 of the Revised Noise Report.

DR NOISE-7. Please confirm whether the reported ambient and predicted project noise levels are presented in A-weighted decibels (dBA). If not, please provide revised values in dBA.

RESPONSE TO DATA REQUEST NOISE-7

Salter, Inc. has prepared a Revised Noise Report responsive to these data requests and is included in Attachment DR NOISE-1. All noise levels listed in Revised Noise Report are A-weighted. The notations have been updated to “dBA” for clarity.

POPULATION AND HOUSING

BACKGROUND: Project Operation

Staff needs to verify the number of expected daily visitors during project operation.

The Project Description Section 2.3.2 page 2-15 (TN Section 2.3.2) states there would be "up to 30 visitors (including deliveries)" per day during operation. The Population and Housing section page 4.14-6 states "up to 50 visitors (including deliveries)" per day during operation.

DATA REQUEST

DR POP HOUSING-1. How many daily visitors are expected during project operation?

RESPONSE TO DATA REQUEST POP HOUSING-1

GIP Vernon estimates the GEP to experience up to 30 visitors (including deliveries) per day during operation.

PROJECT DESCRIPTION

BACKGROUND: Project Description

The GEP Vernon Backup Generating Facility (VBGF) includes an onsite substation and a switching station with two 66 kilovolt (kV) electrical supply lines that would connect to existing Vernon Public Utilities (VPU) Leonis Substation. Staff requires a complete description of both the VBGF interconnection to the VPU transmission grid and the reliability of the VPU grid to understand the potential operation of the back-up generators.

DATA REQUESTS

DR PROJECT DESCRIP-1. Please provide the conductor name, type, current carrying capacity, length, and the overhead conductor size for the two 66 kV transmission lines which connect the existing VPU Leonis Substation to the new project switchyard.

RESPONSE TO DATA REQUEST PROJECT DESCRIP-1

VPU is currently designing the transmission line and the information identified in this Data Request is not available. As discussed in the General Objection section of these responses, this information may be necessary for an AFC or Opt-In Application it simply is not necessary for the CEC to prepare an adequate CEQA document sufficient to support the finding of no significant adverse environmental effect required for an SPPE.

DR PROJECT DESCRIP-2. Please provide pole type, height, and configurations that would support the 66 kV overhead line which would loop into the new switchyard and to the on-site substation. Provide a map showing pole locations of the extensions.

RESPONSE TO DATA REQUEST PROJECT DESCRIP-2

Notwithstanding the General Objection that the detail requested in this data request is not necessary for a CEQA analysis, GIC Vernon has requested this information from VPU. VPU provided a map that depicts preliminary locations of poles that is included in Attachment DR PROJECT DESCRIP-2. If VPU can provide the additional information beyond the preliminary map of the pole locations, GIC Vernon will provide it under separate cover when received.

DR PROJECT DESCRIP-3. Please provide information that reviews the frequency and duration of historic outages of the Leonis Substation and related facilities that would likely trigger the loss of electric service to the proposed onsite substation and could lead to the emergency operations of the diesel- powered generators. This response should identify

the reliability of service historically provided by VPU to similar customers in this part of its service territory.

RESPONSE TO DATA REQUEST PROJECT DESCRIP-3

GIC Vernon requested this information from VPU and will provide it under separate cover when received.

DR PROJECT DESCRIP-4. Please explain whether adding the VBGF would cause any overloads to the VPU transmission system which would require upgrades to the existing transmission or distribution networks.

RESPONSE TO DATA REQUEST PROJECT DESCRIP-4

GIC Vernon requested this information from VPU and will provide it under separate cover when received.

DR PROJECT DESCRIP-5. Does VPU have a public safety power shutoff program (PSPS)? Would neighboring utilities' power shutoff programs impact the VPU system? Please provide the following regarding power shutoff events:

a. Would historical power shutoff events have resulted in the operation of the emergency generators at the proposed VBGF?

b. Have there been changes to the VPU system around the VBGF that would affect the likelihood that future power shutoff events would result in the operation of emergency generators at the proposed VBGF campus?

RESPONSE TO DATA REQUEST PROJECT DESCRIP-5

GIC Vernon requested this information from VPU and will provide it under separate cover when received.

TRANSPORTATION

BACKGROUND: The application requirements for Small Power Plant Exemptions include standard items to be provided by the applicant. The missing items related to Traffic and Transportation are identified below.

DATA REQUESTS

DATA REQUEST DR TRANS-1:

- Provide a map of the transportation-related facilities in the area at 1:250,000 scale.
- Reference all relevant policies/standards in local and regional plans.
- Identify whether the project is within four miles of an airport. If yes, then provide additional details specified in the requirements.
- For roadways in the area, identify their classification, current and future traffic volumes (absent the project), weight limitations, and any sub-standard features related to safety.

RESPONSE TO DATA REQUEST TRANS-1

See General Objection above. GIC Vernon LLC requests a meeting with the relevant CEC Staff to discuss these data requests.

BACKGROUND: Trip Generation Calculations

The SPPE Application (TN 262058) transportation analysis (Kimley-Horn, 2/10/25 memo) identifies that 85 people would come to the site on a typical day, which is comprised of 35 employees and 50 visitors.

DATA REQUESTS

DR TRANS-2. Please confirm whether the “visitors” includes deliveries.

RESPONSE TO DATA REQUEST TRANS-2

See Response to Data Request TRANS-1.

DR TRANS-3. If the site would have 85 people come to the site each day, then how can the daily trip generation be 109-117 trips as specified on Page 3? Assuming the employees drive alone, and they make one extra trip during the day (lunch, errands, etc.), and the employees and visitors have an average vehicle occupancy (AVO) of 1.5 persons per vehicle, this would equate to 160 vehicles trips per day. Please explain the conclusion

of 109-117 daily trips and corresponding exemption for vehicle miles travelled (VMT) (110 trips maximum).

RESPONSE TO DATA REQUEST TRANS-3

See Response to Data Request TRANS-1.

DR TRANS-4. Given the above information suggests that the daily trips would be above the 110-trip threshold for VMT exemption, please provide the VMT analysis.

RESPONSE TO DATA REQUEST TRANS-4

See Response to Data Request TRANS-1.

BACKGROUND: Construction Traffic

For a project like a data center, construction traffic can be a significant factor, including the air quality and noise aspects. Moreover, CEQA Guidelines identify the need to address construction traffic.

DATA REQUEST

DR TRANS-5. Please provide information regarding construction trips. Namely, what are the expected number of daily truck trips, duration of construction, and origin/destination of construction trips?

RESPONSE TO DATA REQUEST TRANS-5

See Response to Data Request TRANS-1.

UTILITIES AND SERVICE SYSTEMS

BACKGROUND: Correct Description of Storm Drainage

Section 4.18.2.2, "Storm Drainage" subsection of the SPPE Application (TN 262029) makes references to the "Delta" (Sacramento-San Joaquin Delta?), Contra Costa County, the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), and Golf Club Road. Based on this information, it appears that this section was copied from another project application in Northern California.

DATA REQUEST

UTILITY-1. Please provide a description of storm drainage for the current project site in Vernon, California. Indicate if the storm drain system discharges into the Los Angeles River and if so, where the nearest discharge point is located.

RESPONSE TO DATA REQUEST UTILITY-1

See Attachment DR UTILITY-1 which includes a revision to SPPE Section 4.18.2.