

DOCKETED	
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Project Title:	Compliance - Application for Certification of DWR Bottlerock Geothermal Project
TN #:	265826
Document Title:	CEC Letter to Bottle Rock LLC
Description:	CEC Letter to Bottle Rock LLC - Reply to Responses to Data Requests Set No. 1, dated August 4, 2024
Filer:	Anwar Ali
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August 28, 2025

Brady Olson
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Bottle Rock Geothermal Power Plant (79-AFC-04C) – Response to Bottle Rock Power, LLC’s Letter dated August 4, 2025 - Reply To Data Requests Set No. 1.

Dear Brady Olson:

The California Energy Commission (CEC) staff have reviewed the responses submitted by Bottle Rock Power, LLC (BRP) on August 4, 2025, which are in reply to the CEC Data Requests Set No. 1. As you stated in your reply, we can meet and discuss; however, we want to detail our approach as to why a full review of the project is needed with the submittal of your most recent petition to amend (PTA).

The requested upgrade for 7.5 megawatts (MW) at this geothermal facility is part of CEC’s certification of 55 MW licensed in 1985. The impacts from this upgrade must be evaluated as a whole in order for CEC staff to understand the impacts on the remaining electrical generation (47.5 MW) requested in this PTA. Under the Public Resources Code, the CEC’s jurisdiction is limited to facilities with a capacity of 50 MW or larger. As approved in the Commission Decision, all parameters in the conditions of certification including limits of emission rates and operating hours, and exhaust parameters of the existing equipment must be evaluated to fully understand the impacts of what was licensed.

This PTA for a 7.5 MW geothermal facility is jurisdictional since it is part of the existing CEC certification of the 55 MW facility. The impacts of 7.5 MW geothermal facility must be evaluated as part of the existing 55 MW facility. The PTA requests employment of new and different technology that was not previously used at this facility. The California Environmental Quality Act (CEQA)

requires a comprehensive assessment of the entire project. Also, if BRP intends to retrofit the existing equipment to utilize a future advanced geothermal technology project, CEC staff needs to better understand how the newly proposed advanced technology, that was not in use or previously reviewed by CEC, would impact this project. The CEC approved BRP's previous requests for reduced environmental monitoring and reporting during suspension of all operations because the project was unable to attain the 55 MW power output as approved by the CEC. Reduced monitoring and reporting requirements are still in effect.

While the current PTA provided an assessment of the environmental impacts for the integration and operation of a 7.5 MW project, it failed to address the environmental assessment of the entire CEC-licensed 55 MW facility as required by CEQA. Therefore, the CEC is requesting BRP provide a complete assessment of the environmental impacts for the 55 MW facility as a whole.

If you have any questions or concerns, please contact me at anwar.ali@energy.ca.gov or (916) 698-7498.

Sincerely,

Anwar Ali

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