| DOCKETED | |
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| **Docket Number:** | 24-OPT-01 |
| **Project Title:** | Perkins Renewable Energy Project |
| **TN #:** | 265951 |
| **Document Title:** | Request for Information Following Second Determination of Incompleteness for the Perkins Renewable Energy Project (24-OPT-01) |
| **Description:** | Transmission System Design |
| **Filer:** | Lorenzo Cano |
| **Organization:** | California Energy Commission |
| **Submitter Role:** | Commission Staff |
| **Submission Date:** | 9/10/2025 11:03:30 AM |
| **Docketed Date:** | 9/10/2025 |

CALIFORNIA ENERGY COMMISSION

CALIFORNIA NATURAL RESOURCES AGENCY

September 10, 2025

IP Perkins, LLC
c/o Intersect Power, LLC
Attn: Camille Wasinger
9450 SW Gemini Drive PMB #68743
Beaverton, OR 97008

**Request for Information Following Second Determination of Incompleteness for the Perkins Renewable Energy Project (24-OPT-01)**

Dear Camille Wasinger,

On February 27, 2024, California Energy Commission (CEC) staff confirmed receipt of an Opt-In Application for the Perkins Renewable Energy Project (project) (24-OPT-01) by IP Perkins, LLC, IP Perkins BAAH, LLC, and related affiliates (collectively, applicant), subsidiaries of Intersect Power, LLC. The applicant proposes to construct, operate, maintain, and decommission an approximately 1,150-megawatt (MW) solar photovoltaic (PV) and battery energy storage system (BESS) on United States Bureau of Land Management and Bureau of Reclamation administered public lands (approximately 5,611 acres), and private lands (approximately 515 acres) in Imperial County east of El Centro, California.

CEC staff issued a Second Determination of Incompleteness and Request for Information letter for the project on July 11, 2025 (TN 264669) for outstanding data needs in the areas of Air Quality (includes Greenhouse Gases), Biological Resources, Cultural/Tribal Cultural Resources, Hazardous Materials Handling, Land Use, Public Health, Socioeconomics, Traffic and Transportation, and Worker Safety. Additional data is still needed in the area of Transmission System Design. Subsequent to the issuance of the July 11 letter, CEC staff determined there are no additional information requests for Mandatory Opt-In Requirements and Project Description.

Pursuant to Public Resources Code, section 25545.4(b), CEC staff requires the information described in the attachments to this letter to be submitted. Attachment A consists of a specific request for Transmission System Design needed for staff to complete its environmental analysis of the proposed project.

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 sections 25545 et seq.

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.

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 the requests for information are now complete and address all identified deficiencies, CEC staff will finalize review of the information provided and document its application completeness determination 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: REV 1 Data Completeness Worksheets for Title 20, section 1877
Attachment B: REV 1 Data Requests

# Perkins Renewable Energy Project (24-OPT-01)
# Follow Up to Second Completeness Review

Incomplete

1. Transmission System Design
2. Air Quality (includes Greenhouse Gases)
3. Biological Resources
4. Cultural/Tribal Cultural Resources
5. Hazardous Materials Handling
6. Land Use
7. Public Health
8. Socioeconomics
9. Traffic and Transportation
10. Worker Safety

Complete

1. Mandatory Opt-In Requirements
2. Alternatives
3. Efficiency, Energy, and Energy Resources
4. Facility Design
5. Executive Summary
6. Geological Hazards
7. Noise and Vibration
8. Paleontological Resources
9. Project Description
10. Reliability
11. Soils
12. Transmission System Safety and Nuisance
13. Visual Resources
14. Waste Management
15. Water Resources
16. Wildfire

# Attachment A

Revision 1 Data Completeness Worksheets
for Title 20, section 1877

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete ___ Incomplete **x** Revision No. ~~0~~**1** Date: ~~March 28, 2024~~ **September 2025**

Technical Area: **Transmission System Design** Project: Perkins Renewable Energy Project Technical Staff: Sudath Edirisuriya

Project Manager: Lisa Worrall~~/Ann Crisp~~ Docket: 24-OPT-01 Technical Senior: Joseph Hughes

| SITING REGULATIONS | INFORMATION | APPLICATION PAGE NUMBER AND SECTION 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 2, Subsection 2.4, pp 2.4-34 to 2.4-40 | 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 2, Subsection 2.**4, and TN 262219, Perkins Response to Data Request Batch 3 Part 1, Section 4** | ~~No~~**Yes** | ~~See DR TSD-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 3.7 | Yes | |
| 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 2, Subsections 2.1.1, 2.3.1, and 2.4, pp 2.4-34 to 2.4-40, Figures 2.3-1 to 2.3-5 | Yes | |

**DATA COMPLETENESS WORKSHEET**

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|---|---|---|---|---|
| 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. | Section 2, Subsections 2.1.1, 2.3.1, and 2.4, pp 2.4-34 to 2.4-40, Figures 2.3-1 to 2.3-5 | 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. | Section 2, Subsection 2.4, pp. 2.4-34 to 2.4-40**; TN 262219, Perkins Response to Data Request Batch 3 Part 1, Section 4** | ~~No~~**Yes** | ~~See DR TSD-2~~ |
| 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, | Section 2, Subsection 2.4, pp 2.4-34 to 2.4-40 | Yes | |

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| SITING REGULATIONS | INFORMATION | APPLICATION PAGE NUMBER AND SECTION NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|---|---|---|
| | and electric transmission constraints. | | | |
| 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.<br><br>If the interconnection and operation of the proposed project will likely impact an 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 that there are no system impacts requiring mitigation. | Section 2, Subsection 2.4, pp. 2.4-34 to 2.4-40**; TN 262219, Perkins Response to Data Request Batch 3 Part 1, Section 4** | No | ~~See DR TSD-3, TSD-4~~ **See REV1 TSD-1** |
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and | Subsection 3.6, Tables 3.6-1 and 3.6-2; Sections 4.1 to 4.18 | Yes | |

**DATA COMPLETENESS WORKSHEET**

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| SITING REGULATIONS | INFORMATION | APPLICATION PAGE NUMBER AND SECTION NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|---|---|---|
| | 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 | | | |
| 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 3.6, Table 3.6-1 and 3.6-2 | 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 provide the name of the official who will serve as a contact person for Commission staff. | Subsection 2.10; Appendix E | Yes | |

**DATA COMPLETENESS WORKSHEET**

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|---|---|---|---|---|
| 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, Subsection 2.4, pp 2.4-34 to 2.4-40**; TN 262219, Perkins Response to Data Request Batch 3 Part 1, Section 4** | ~~No~~**Yes** | ~~See DR TSD-5~~ |

# Attachment B

Revision 1 Data Requests

# Attachment B Revision 1 Data Requests

## TRANSMISSION SYSTEM DESIGN

Staff reviewed the responses to DR TSD-3 and DR TSD-4 submitted in Perkins Response to Data Request Batch 3 Part 1 (TN 262219). The response to DR TSD-3 shows the network upgrades necessary for the Perkins Renewable Energy Project. The table below is partially excerpted from Table 3 from the data response to DR TSD-3. Staff will analyze the potential impacts of network upgrades, as discussed in DR TSD-4, but to do so, staff has further questions.

**REV 1 DR TSD-1.** Please describe what work would be done for this upgrade needed to interconnect the Perkins Renewable Energy Project to the electric grid. Staff needs to be able to list the work needed as part of the project description and have enough description of the work to be able to evaluate whether this work would result in impacts according to a California Environmental Quality Act analysis. This would include a discussion of how the work would be carried out. Also, staff needs a list and description of all the San Diego Gas and Electric standard Construction Measures that would be implemented, as stated in Table 3.

Table 3 DR TSD-3 Downstream Network Upgrades

| Upgrade | Description | Project Cost Allocation | CEQA Analysis |
|---|---|---|---|
| GRNU | | | |
| Cost of interconnection | Engineering, Design, Land Management, Administration, Project Management | 100% | Any work will occur within the fence line of the Imperial Valley Substation. SDG&E standard Construction Measures will be implemented to ensure impacts are less than significant |