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CALIFORNIA ENERGY COMMISSION

CALIFORNIA NATURAL RESOURCES AGENCY

November 3, 2025, 2025

Jon Boyer
Enterprise BESS LLC
201 Enterprise Street
Escondido California, 92029

Data Requests for Enterprise Emergency Peaker Project (01-EP-10C)

Dear Jon Boyer:

The California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests which is necessary for the staff analysis of the Enterprise Emergency Peaker Project (EEPP) revised petition to amend (TN#262237). The proposed project changes include constructing and operating a nominal 52-megawatt (MW) battery energy storage system (hereinafter, Enterprise BESS Project). The proposed Enterprise BESS Project would be located on the adjacent property(s) to the north along the south side of Auto Park Way.

These Data Requests seek further information in the areas of Hazardous Materials Management and Worker Safety/Fire Protection based on the contents of the petition to amend.

To assist CEC staff in timely completing its environmental review and to meet the requirements of the California Environmental Quality Act Guidelines (see Cal. Code Regs., tit. 14, §§ 15108, 15109), CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please let me know within 10 days of receipt of this letter.

If you have any questions, please email me at Joseph.Douglas@energy.ca.gov.

Joseph Douglas
Compliance Project Manager

Enclosure: Data Requests:

TECHNICAL AREA

HAZARDOUS MATERIALS MANAGEMENT/WORKER SAFETY AND FIRE PROTECTION

Author: Michele Shi

BACKGROUND: Site Security

The project owner describes the site security during operations and maintenance on page 13 of the petition.

DATA REQUESTS

1. Provide a description of proposed site security measures during the construction phase of the proposed BESS project.
2. Provide a description of the BESS project site access from the existing Enterprise Emergency Peaker Plant.

BACKGROUND: Explosion Control and Gas Detection Systems

The applicant describes toxic and flammable gases as key hazards with BESS on page H-4. Explosion control measures are described on page A-48 under the Public Services/Fire Protection analysis. The applicant stated, "Each battery container will be equipped with a blast door designed to deploy in the event of an explosion and direct any hot gas and energy upwards and away from any adjacent equipment or personnel."

Staff requires additional details on the proposed explosion control and gas detection 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.

DATA REQUESTS

3. Provide a schematic of the proposed battery container gas detection systems and a detailed description of these systems. Provide a discussion of the specific gas(es) or vapor(s) intended to be detected.
4. Provide a schematic of the proposed battery container explosion control systems and a detailed description of these systems.
5. Provide a description of how the proposed battery container explosion control systems will comply with the applicable National Fire Protection Association

(NFPA) standards (e.g., NFPA 68, 69, 855, etc.) and the local fire department requirements.

WORKER SAFETY AND FIRE PROTECTION

Authors: Michele Shi

BACKGROUND: Hazard Mitigation Analysis

Lithium iron phosphate (LFP) or other battery technologies are mentioned throughout the petition. The applicant mentions CATL and SYL or other Tier 1 battery manufacturers, and Figure 2 references SYL battery container dimensions.

Staff requires additional information on the type of battery technology for the proposed project to analyze the safety controls and inherent hazards associated with these systems, which can vary depending on battery technology. Staff requires the hazard mitigation analysis to assess the hazards and impacts associated with the BESS manufacturer/model being proposed.

DATA REQUESTS

6. Provide the BESS manufacturer's technical data sheet including the specifications, ratings, and listings of the BESS manufacturer/model being proposed.
7. Provide the Safety Data Sheet for hazardous materials contained in the BESS manufacturer/model being proposed, including related to the fire suppression system and liquid-coolant air conditioning system.
8. Provide the UL 9540A cell, module, and unit level test reports for the BESS manufacturer/model being proposed.
9. Provide a description of how the hazard mitigation analysis for the proposed BESS technology will comply with the California Fire Code section 1207.1.4, the applicable NFPA standards (e.g., NFPA 855), and the local fire department requirements.
10. Provide a draft outline of the information that would be included in the Hazard Mitigation Analysis for the BESS manufacturer/model being proposed.
11. Provide a history of failure incidents utilizing the BESS manufacturer/model being proposed. Provide a complete description of the proposed measures to prevent failure incidents for the proposed project.

ENTERPRISE EMERGENCY PEAKER PROJECT (01-EP-10C)
DATA REQUESTS

BACKGROUND: BESS Location and Installation

The petition provides Figure 2 Site Layout and describes the BESS installations on page H-6.

Staff requires additional details on the BESS container 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.

12. Provide a description of how the proposed BESS project will comply with the 2026 edition of the NFPA 855 Standard for the Installation of Stationary Energy Storage Systems.
13. Provide correspondence with the City of Escondido Fire Department detailing the location and installation requirements for the BESS project (e.g., access roads, setbacks, etc.).
14. Provide plans of the BESS project that specify the minimum clearances between the BESS containers' exposure hazards including but not limited to buildings, lot lines, and fire barriers if used.
15. Provide a discussion of how the BESS project design satisfies the local fire department requirements for minimum separation and setback distances. Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

BACKGROUND: Fire Detection and Fire Suppression Systems for BESS Containers

Proposed fire protection systems are discussed starting on page A-48 under the Public Services/Fire Protection analysis. The applicant stated "Planned fire protection systems include an active aerosol based thermal activated fire suppression system in each individual battery container as well as a centralized fire detection alarm system that can be configured to independently dial the Energy Management System (EMS) in the case of a fire or thermal event. Each battery will be equipped with its own coolant-based chiller to keep the batteries at an optimal temperature and prevent thermal runaway."

Staff requires additional details on the 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.

DATA REQUEST

16. Provide a schematic of the proposed battery container fire suppression systems (e.g. water-based, gaseous, etc.) and a detailed description of these systems.

BACKGROUND: Water-Based Fire Protection Systems for BESS Project

Proposed fire protection systems are discussed starting on page A-46 under the Public Services/Fire Protection analysis. The applicant described fire safety and fire-fighting related requirements recommended by the City of Escondido Fire Department during the original licensing proceeding for the Enterprise Emergency Peaker Project. The applicant stated on page H-6, "An existing City fire hydrant is located 75 feet to the east of the eastern site entrance on Auto Park Way."

Staff requires additional information on how the applicant has addressed current recommendations by the City of Escondido Fire Department regarding fire safety of the proposed Enterprise BESS Project.

DATA REQUESTS

17. Provide correspondence with the City of Escondido Fire Department detailing the fire protection system requirements for the BESS project.
18. Provide plans and/or a description of the amount and hydraulic performance of the existing City fire hydrant(s).
19. Provide the worst-case fire water flow requirements in GPM (gallons per minute) during emergency conditions. Provide descriptions of all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.
20. Provide a schematic of the water-based fire protection system for the site of the BESS project and a detailed description of these systems, such as locations of fire water pipeline, fire water storage tanks, fire pumps, fire hydrants, etc.
21. Confirm whether the existing fire hydrant(s) satisfies the installation and performance requirements of the City of Escondido Fire Department as required for continued conformance with Condition of Certification PUB SER-2.
22. Provide a complete description of the proposed measures for supplying additional fire water supply during extended emergency conditions.

BACKGROUND: Emergency Response and Emergency Action Plan

A BESS Emergency Response Plan is mentioned on page A-48 under the Public Services/Fire Protection analysis. Emergency response is further discussed on pages H-7 and H-8. The applicant stated "Prior to operation of the Enterprise BESS Project, MRP will develop an Emergency Response Plan in coordination with the City of Escondido Fire Department that complies with the requirements of SB38." Senate Bill No. 38

(2023, Laird) (SB38) pertains to battery energy storage facilities and requires an emergency response and emergency action plan.

DATA REQUESTS

23. Provide a draft outline of the information that would be included in the emergency response and action plan for the proposed BESS project during the construction and operation phases.
24. 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.
25. Provide a discussion of the anticipated response time by local first response agencies for incidents involving a BESS (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.
26. 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.
27. 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.

BACKGROUND: Fire Prevention Plan

The petition does not describe the Fire Prevention Plan during construction and operation.

DATA REQUESTS

28. Provide a draft outline of the information that would be included in the Fire Prevention Plan for the proposed BESS project for the construction and operation phases. Provide a discussion of project-specific potential fire hazards, control procedures, fire protection systems, etc.
29. Provide a complete description of the proposed training programs for the 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).

ENTERPRISE EMERGENCY PEAKER PROJECT (01-EP-10C)
DATA REQUESTS

BACKGROUND: Emergency and Standy Power Systems

The petition does not describe the emergency and standby power systems during construction and operation.

DATA REQUEST

30. 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).