

DOCKETED	
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Project Title:	Viracocha Hill Battery Energy Storage System Project
TN #:	267238
Document Title:	Determination of Incomplete Application and Request for Information for the Viracocha Hill Battery Energy Storage System Project
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Docketed Date:	11/14/2025



November 14, 2025

Antonio Arturo Sieira Mucientes
CEO
Reclaimed Wind LLC
600 W Broadway – Suite 700
San Diego, California 92101

Determination of Incomplete Application and Request for Information for the Viracocha Hill Battery Energy Storage System Project (25-OPT-01)

Dear Antonio Arturo Sieira Mucientes:

California Energy Commission (CEC) staff confirmed receipt on October 15, 2025, of an Opt-In Application for the Viracocha Hill Battery Energy Storage System (BESS) Project (25-OPT-01). Reclaimed Wind, LLC (applicant), proposes to construct, own, and operate the 90.7-megawatt (MW) (362.8 MW-hour) Viracocha Hill BESS Project. The project would be located on approximately 17 acres (BESS equipment yard) of an approximately 443-acre parcel (APN 99B-7300-1-5) in eastern Alameda County in the Altamont Pass Wind Resource Area.

In addition to the BESS, the project would include an onsite substation, medium voltage transformer, fire water pump and tank, emergency diesel generator, operations and maintenance pad, auxiliary equipment pad, laydown area, retention pond, access road, and roadway improvements. An approximately 1,325-foot-long gen-tie line is proposed connecting to the Ralph Substation. If expanding the Ralph Substation is infeasible, a new switching station or a line-tap would be developed adjacent to the existing substation.

Operation of the transmission system is controlled by Pacific Gas and Electric Company (PG&E), the regional balancing authority and transmission owner. The point of interconnection is at the proposed PG&E Kelso-Tesla 230 kilovolt line via the Ralph Substation approximately 1,325 feet from the Viracocha Hill BESS. The applicant would engineer, construct, own, operate, and maintain the interconnection gen-tie between the proposed Viracocha Hill BESS and the Ralph Substation.

CEC staff has completed its review of the project application pursuant to California Code of Regulations, title 20, section 1877, which specifies the required contents of an Opt-In

application and Public Resources Code, section 25545.4(a), and which states, "within 30 days of the submission of the application, the commission shall review the application and make a determination of completeness." Based on this review, CEC staff has determined the submitted application is incomplete.

Pursuant to Public Resources Code, section 25545.4(b), CEC staff requires the information described in the attachments to this letter be submitted. The attachments consist of: (1) data completeness worksheets listing the requirements specified in statute and regulations; and (2) requests for additional information needed for staff to complete its environmental and other analyses of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to perform a related review for Opt-In applications.

CEC staff's review of the application has identified several topics with data requests which are described in detail in Attachment B. As an example, staff requires additional details related to biological resources, including nitrogen deposition modeling, along with updates on the Section 10 Habitat Conservation Plan (HCP) and an assessment of potential habitat impacts from BESS-related fire risks; air dispersion modeling to quantify the pollutant concentrations during construction and during potential BESS thermal runaway/fire scenario; complete descriptions of the project transmission and interconnection facilities; and additional details on the BESS enclosure locations, setbacks, and internal access roads in order to verify that the project has proposed adequate project features to mitigate adverse impacts during an emergency response. Staff also requires additional details for the project's proposed fire prevention, extinguishing, and suppression systems to verify that the proposed project features are adequate to mitigate adverse impacts to operations personnel, emergency first responders, and the public.

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

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

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

Antonio Arturo Sieira Mucientes
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regarding application completeness in a subsequent letter. Any further requests by CEC staff for missing information in response to additional information provided by the applicant will be made within 45 days, or as soon as practicable thereafter, of receipt of that information (Pub. Resources Code, § 25545.4(b)(1)).

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'Drew Bohan', with a stylized, sweeping underline.

Drew Bohan
Executive Director

Attachments

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

Viracocha Hill Battery Energy Storage System Project (25-OPT-01) Completeness Review

Incomplete

1. Air Quality (includes Greenhouse Gases)
2. Alternatives
3. Biological Resources
4. Cultural/Tribal Cultural Resources
5. Executive Summary
6. Hazardous Materials Handling
7. Land Use, Agriculture, and Forestry
8. Noise
9. Project Description
10. Public Health
11. Socioeconomics
12. Soils
13. Transportation
14. Transmission System Design
15. Visual Resources
16. Waste Management
17. Water Resources
18. Wildfire
19. Worker Safety and Fire Protection

Complete

1. Mandatory Opt-In Requirements
2. Efficiency, Energy, and Energy Resources
3. Facility Design
4. Geological Hazards
5. Paleontological Resources
6. Reliability
7. Transmission System Safety and Nuisance

Attachment A

Data Completeness Worksheets
for Title 20, section 1877

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
AUTHORITY AND VERIFICATION				
Cal. Code Regs., tit. 20 § 1707	Every notice and application shall be dated and signed by the applicant attesting under penalty of perjury to its truth and accuracy.	Cover letter	Yes	
"FACILITY" OR "DISCRETIONARY PROJECT" DEFINITION MET				
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)	Explanation of how the facility meets one or more of the definitions of "facility":	Section 2.2, pp. 2-1 to 2-15	Yes	
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)(4)	If the opt-in application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application shall contain a detailed description of how the facility meets the criteria specified in section 25545(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technologies.	N/A	N/A	N/A
REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE				

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.			
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	--	--	--
Pub. Resources Code, § 25545.3.3(a)	The entirety of the construction of the covered project is a public work.	N/A	N/A	N/A
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following apply:	--	--	--
Pub. Resources Code, § 25545.3.3(b)(1)	Applicant ensures that the prevailing wage requirement is included in all contracts for the performance of all construction work.	Appendix 4B	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(2)	Contractors and subcontractors must pay all construction workers employed in the construction of the project at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.3(b)(3)	Contractors and subcontractors performing construction work on the project shall employ apprentices at no less than the ratio required in the Labor Code section 1777.5.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.3(b)(4)	Except as provided in (b)(6), all contractors and subcontractors performing construction work shall maintain and verify payroll records pursuant the Labor Code section 1776, make those records available for inspection and copying, and furnish those payroll records to the Labor Commissioner pursuant to the Labor Code section 1771.4.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	Appendix 4B	Yes	

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Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	--	--	--
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 4B	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

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

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Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	--	--	--
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	Appendix 4B	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	--	--	--
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 4B	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 4B	Yes	
PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)				

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Completeness: Complete **X** Incomplete _____

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	Section 4.3, pp. 4-2 to 4-3	Yes	
IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA				
Cal. Code Regs., tit. 20, § 1877(e)	Identify whether the project is on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	Section 4.4, p. 4-3	Yes	
LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT				
Cal. Code Regs., tit. 2, § 1877(g) ; Pub. Resources Code § 25545.10	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations prior to project certification, consistent with Public Resources Code section 25545.10.	Appendix 4A	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____

Revision No. 0 Date: November 2025

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Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS				
Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.	Section 4.7, pp. 4-5 to 4-6	Yes	
Pub. Resources Code § 21183(a)	The project will result in a minimum investment of \$100,000,000 in California upon completion.	Section 4.7, p. 4-5; Section 5.10, Subsection 5.10.2.3, pp. 5.10-10 to 5.10-11	Yes	
Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	Section 4.7, p. 4-5, Appendix 4B	Yes	
Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.	N/A	N/A	N/A

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Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	Section 4.7 p. 4-5; Section 5.14 p. 5.14-1 to 5.14-7	Yes	
Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.	Section 4.7, p. 4-6	Yes	
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...	Section 4.7, p. 4-6	Yes	
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...	Section 4.7, p. 4-6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.	N/A	N/A	N/A
Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 21180(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	--	--	--
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	N/A	N/A	N/A
Pub. Resources Code § 21183.6(a)(2)	Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority: 1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to, energy efficiency, installation	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of renewable energy electricity generation, and reductions in vehicle miles traveled. 2. The remaining unmitigated impacts shall be mitigated by direct emissions reductions that also reduce emissions of criteria air pollutants or toxic air contaminants within the same air pollution control district or air quality management district in which the project is located. 3. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate within the same air pollution control district or air quality management district in which the project is located. The offsets shall be undertaken in a manner consistent with the Health and Safety Code section 38500, including, but not limited to, the requirement that the offsets be real, permanent, quantifiable, verifiable, and enforceable, and shall be undertaken from sources in the community in which the project is located or in adjacent communities. 4. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate from sources that provide a specific, quantifiable, and			

DATA COMPLETENESS WORKSHEET

Completeness: Complete X Incomplete

Revision No. 0 Date: November 2025

Technical Area: Mandatory Opt-In Requirements

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

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Technical Senior: Kaycee Chang

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

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Air Quality**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Andres Perez, Winston Potts
 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.1, Subsection 5.1.6, pp. 5.1-11 to 5.1-17; Section 5.1, Subsection 5.1.9, pp. 5.1-19 to 5.1-27	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 5.1, Subsections 5.1.4 and 5.1.5, pp. 5.1-3 to 5.1-10	Yes	C
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 5.1, Subsection 5.1.14, pp. 5.1-40 to 5.1-41	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 5.1, Subsections 5.1.2 and 5.1.3, pp. 5.1-2 to 5.1-3; Section 5.1, Subsections 5.1.6 to 5.1.10, pp. 5.1-11 to 5.1-28	No	See DRs AQ-4, AQ-5, GHG-4, GHG-5, GHG-6, GHG-8 through GHG-11, WASTE-2, PH-3, and PH-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Air Quality**

Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS

Docket: 25-OPT-01

Revision No. 0 Date: November 2025

Technical Staff: Andres Perez, Winston Potts

Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	N/A	N/A	N/A
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	Section 5.1, Subsection 5.1.9.1, p. 5.1-24	No	See DR AQ-1
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Section 5.1, Subsection 5.1.8, p. 5.1-19	No	See DRs AQ-2 and AQ-3
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	N/A	N/A	N/A
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO ₂ , CH ₄ , N ₂ O, and SF ₆) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Section 5.1, Subsection 5.1.6, pp. 5.1-11 to 5.1-14; Appendices 5.1A and 5.1B	No	See DRs AQ-1 through AQ-3 and GHG-2 through GHG-7
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	Section 5.1, Subsection 5.1.6, pp. 5.1-11 to 5.1-13	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **X**
 Technical Area: **Air Quality** Project: Viracocha Hill BESS Revision No. 0 Date: November 2025
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Staff: Andres Perez, Winston Potts
 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	N/A	N/A	N/A
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	Section 5.1, Subsection 5.1.5, pp. 5.1-7 to 5.1-10	Yes	
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Section 5.1, Subsection 5.1.9, pp. 5.1-20 to 5.1-23	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Air Quality**
 Project Manager: Eric Veerkamp

Revision No. 0 Date: November 2025
 Project: Viracocha Hill BESS Technical Staff: Andres Perez, Winston Potts
 Docket: 25-OPT-01 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	N/A	N/A	N/A
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Section 5.1, Subsection 5.1.9, pp. 5.1-20 to 5.1-23	Yes	
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:	--	--	--
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM ₁₀) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO _x), sulfur dioxide (SO ₂), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM ₁₀)	Section 5.1, Subsection 5.1.9, p. 5.1-19	No	See DR AQ-4

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 Technical Area: **Air Quality**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Andres Perez, Winston Potts
 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and particulate matter less than 2.5 microns in diameter (PM _{2.5}) from construction-related equipment;			
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5}) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;	Section 5.1, Subsection 5.1.6, pp. 5.1-11 to 5.1-13; Section 5.1, Subsections 5.1.9 and 5.1.10, pp. 5.1-19 to 5.1-28	No	See DRs PH-3 and PH-4
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	Section 5.1, Subsection 5.1.7, p. 5.1-18	No	See DR AQ-5

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Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Air Quality**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
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Revision No. 0 Date: November 2025
 Technical Staff: Andres Perez, Winston Potts
 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5} .	N/A	N/A	N/A
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide the following information:	--	--	--
Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	N/A	N/A	N/A
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	N/A	N/A	N/A
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Section 5.1, Subsection 5.1.6.2, p. 5.1.-16	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use	Section 5.1, Subsection 5.1.11, pp. 5.1-28 to 5.1-39	Yes	

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Completeness: Complete ____ Incomplete **X**
 Technical Area: **Air Quality**
 Project Manager: Eric Veerkamp

Revision No. 0 Date: November 2025
 Project: Viracocha Hill BESS Technical Staff: Andres Perez, Winston Potts
 Docket: 25-OPT-01 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Section 5.1, Subsection 5.1.12, Table 5.1-17, p. 5.1-39	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.	Section 5.1, Subsection 5.1.12, Table 5.1-17, p. 5.1-39	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.1, Subsection 5.1.13, p. 5.1-40	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Alternatives** Project: Viracocha Hill BESS

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Eric Veerkamp Docket: 25-OPT-01

Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.	Subsection 6.3 to 6.4, pp. 6-2 to 6-6; Figure 6-1, p. 6-4	No	See DR ALT-1
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).	Subsection 6.3 to 6.4, pp. 6-2 to 6-6; Figure 6-1, p. 6-4	No	See DR ALT-1

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Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Biological Resources**

Project: Viracocha Hill BESS

Technical Staff: Woodruff

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 5.2, pp. 5.2-1 to 5.2-59; Appendices 5.2A, 5.2B. 5.2C; Comprehensive Biological Survey Report; Draft ITP App	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 5.2.1.9, pp. 5.2-24 to 5.2-27; Comprehensive Biological Survey Report , Section 2, pp. 2-1 to 2-9; Draft ITP App, Section 3, pp. 3-1 to 3-12	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 5.2.8, pp. 5.2-55 to 5.2-59; Appendices 5.2A, 5.2B; Comprehensive Biological Survey Report; Draft ITP App, Section 1.5.2, pp. 1-2 to 1-3	Yes	
[OPT-IN ONLY] Cal. Code Regs., tit. 20, § 1877 (a)	If the applicant is seeking incidental take authorization as described in California Fish and Game Code section 2081(b), the application shall include the information required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10). If the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602(a)(1)(A)-(F).	Section 5.2.7, pp. 5.2-55; Draft ITP App, Subsection 3.3.2, pp. 3-3 to 3-12	No	See DR BIO-1 to DR BIO-12

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Revision No. 0 Date: November 2025

Technical Area: **Biological Resources**

Project: Viracocha Hill BESS

Technical Staff: Leane Dunn, Julie Woodruff

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 5.2.1, pp. 5.2-4 to 5.2-24; Section 5.2.2.2, pp. 5.2-35 to 5.2-44; Section 5.2.4, pp. 5.2-45 to 5.2-48; Section 5.2.3, pp. 5.2-44; Comprehensive Biological Survey Report , Section 2.3, pp. 2-2 to 2-9; Draft ITP App, Section 3, pp. 3-1 to 3-12; Section 4, pp. 4-1 to 4-15; Section 5, pp. 5-1 to 5-13, Section 6, pp. 6-1 to 6-2; Section 4.4, pp. 4-15	No	See DR BIO-3 through DR BIO-5, and DR BIO-18 through DR BIO-20, and DR BIO-23
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic wildlife resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity Database (CNDDDB), and a citation which includes the date the CNDDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing sensitive	Section 5.2, pp. 5.2-1 to 5.2-23; Section 5.2.1.5, Figure 1; Comprehensive Biological Survey Report, Section 2, pp. 2-1 to 2-9, Section 2.2, pp. 2-1 to 2-2; Figure 1 and 2	Yes	

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Revision No. 0 Date: November 2025

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Project: Viracocha Hill BESS

Technical Staff: Leane Dunn, Julie Woodruff

Project Manager: Eric Veerkamp

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Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include:			
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	Section 5.2.1.6, Table 5.2-2 and Table 5.2-3; Comprehensive Biological Survey Report, Appendix A and B; Draft ITP App, Appendix B	Yes	
Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	Section 5.2.1.6, Table 5.2-2 and Table 5.2-3 Comprehensive Biological Survey Report, Appendix A and B; Draft ITP App, Appendix B	Yes	
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Section 5.2.1.6, Table 5.2-2 and Table 5.2-3 Comprehensive Biological Survey Report, Appendix A and B; Draft ITP App, Appendix B	Yes	
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Section 5.2.1.7, pp. 5.2-22, Appendix 5.2C	Yes	
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to	Section 5.2.1.6, Table 5.2-2 and Table 5.2-3; Section 5.2.1.2, pp. 5.2-6; Sectio 5.2.1.4, pp. 5.2-8 to	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

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Docket: 25-OPT-01

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	those identified by the CNDDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission or other responsible agency;	5.2-9; Comprehensive Biological Survey Report, Appendix A and B; Draft ITP App, Appendix B		
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances;	Section 5.2.5.3, pp. 5.2-54 to 5.2-55 and Table 5.2-7, pp. 5.2-51	Yes	
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Section 5.2.1.6, Table 5.2-2; Section 5.2.1.6, pp. 5.2-10 to 5.2-11; Comprehensive Biological Survey Report, Section 3.1.1, pp. 3-1 Appendix A; Draft ITP App, Appendix B	Yes	
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Section 5.2.1.1, pp. 5.2-6, 5.2-38	No	See DR BIO-22
Appendix B (g) (13) (B)	Include a list of the species and habitat(s) observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors. Maps or aerial photographs shall include the following:	Section 5.2.1.10, Figure 5.2-4, 5.2-5; Figure 5.2-6; Comprehensive Biological Survey Report Figure 3-1, Figure 3-2, Figure 3, Figure 3-3; Draft ITP App Figure 2, Figure 3-1	No	See DR BIO-22
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a	Section 5.2.1.10, Figure 5.2-4, 5.2-5; Figure 5.2-6;	Yes	

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Project Manager: Eric Veerkamp

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	recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under confidential cover) and 1:350,000 (for public viewing) that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDb, and the associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities.	Comprehensive Biological Survey Report Figure 3-1, Figure 3-2, Figure 3, Figure 3-3; Draft ITP App, Figure 2 and Figure 3-1		
Appendix B (g) (13) (B) (ii)	Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided.	None	No	See DR BIO-13
Appendix B (g) (13) (B) (iii)	An aerial photo depicting state and federal jurisdictional features including state waters and wetlands delineated on maps at a scale of (1:2,400) showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance if wetlands occur within 250	Appendix 5.2A, Figure 4, Figure 5; Comprehensive Biological Survey Report, Figure 3-3	Yes	

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Revision No. 0 Date: November 2025

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application, Regional Water Quality Control Board (RWQCB) application, or California Department of Fish and Wildlife Section 1600 et seq. permit requirements. For projects proposed to be located within the coastal zone, also provide aerial photographs or maps as described above that identify wetlands as defined by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Provided via KiteWorks	Yes	
Appendix B (g) (13) (C)	A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate	Section 5.2.1.10, pp. 5.2-27 to 5.2-34, Appendix 5.2A, 5.2B, and 5.2C; Comprehensive Biological Survey Report , Section 4, pp. 4-1; Draft ITP App, Section 3.3.2.1, pp. 3-4 to 3-12.	Yes	

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	biological resources including the following:			
Appendix B (g) (13) (C) (i)	A list of sensitive species and habitats with a potential to occur (defined in (A) above) and include status (state, federal, California Native Plant Society, global rank, state rank, etc.)	Section 5.2.1.6, Table 5.2-2 and Table 5.2-3 Comprehensive Biological Survey Report, Appendix A and B; Draft ITP App, Appendix B	Yes	
Appendix B (g) (13) (C) (iii)	Perform nitrogen deposition modeling including the complete citation for references used in determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.	Section 5.2.2.3, p. 5.2-43	No	See DR BIO-13
Appendix B (g) (13) (D)	A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDDB records and field survey forms completed by the applicant's biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the	Comprehensive Biological Survey Report , Section 2, pp. 2-1 to 2-9 and Section 3, pp. 3-1 to 3-18	No	See DR BIO-14 through DR BIO-17

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Revision No. 0 Date: November 2025

Technical Area: Biological Resources

Project: Viracocha Hill BESS

Technical Staff: Woodruff

Project Manager: Eric Veerkamp

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	biologists conducting the surveys. Include:			
Appendix B (g) (13) (D) (i)	Current biological resources surveys conducted using appropriate field survey protocols (include references) during the appropriate season(s). State and federal agencies with jurisdiction shall be consulted for field survey protocol guidance prior to surveys if a protocol exists.	Comprehensive Biological Survey Report, Section 2, pp. 2-1 to 2-9	No	See DR BIO-14 through DR BIO-17
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.	Section 5.2.1.3, pp. 5.2-8; Appendix 5.2A Comprehensive Biological Survey Report, Section 3.5, pp. 3-16 to 3-18, Figure 3-3	No	See DR BIO-12
Appendix B (g) (13) (E)	Impacts discussion of all impacts (direct, indirect, and cumulative) to biological resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Discussion shall also	Section 5.2.2.2, Page 5.2-35 to 5.2 to 5.2-44; Draft ITP App, Section 4, pp. 4-1 to 4-15	No	See DR BIO-1 through DR BIO-9 and DR BIO-18 through DR BIO-20

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Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Biological Resources**

Project: Viracocha Hill BESS

Technical Staff: Leane Dunn, Julie Woodruff

Project Manager: Eric Veerkamp

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	address sensitive species habitat impacts from air emissions (i.e., nitrogen deposition);			
Appendix B (g) (13) (F)	A discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level of impacts, including, but not limited to the following:	Section 5.2.4, pp. 5.2-45 to 5.2-48; Draft ITP App, Section 5, pp. 5-1 to 5-13	Yes	
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Section 5.2.4, pp. 5.2-45 to 5.2-48; Draft ITP App, Section 5, Pages 5-1 to 5-13	No	See DR BIO-8 through DR BIO-11 and DR BIO-18 through DR BIO-19
Appendix B (g) (13) (F) (ii)	All off-site habitat mitigation such as habitat improvement or compensation including management, and an identification of appropriate agency contacts for coordination and verification of proposed habitat mitigation measures.	Section 5.2.4.7, pp. 5.2-48; Draft ITP App, Section 5.8.2, pp. 5-12 to 5-13	No	See DR BIO-11 and DR BIO-18 through DR BIO-19
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	Section 5.2.4.3, pp. 5.2-46; Draft ITP App, 5.1.1.3, pp. 5-2	Yes	
Appendix B (g) (13) (G)	A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project.	Section 5.2.4, pp. 5.2-45 to 5.2-48; Draft ITP App, Section 2.9, pp. 2-14 to 2-15 and Section 5, pp. 5-1 to 5-13	Yes	
Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource	None	No	See DR BIO-21

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: Biological Resources

Project: Viracocha Hill BESS

Technical Staff: Woodruff

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 5.2, Table 5.2-7	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 5.2, Table 5.2-7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Biological Resources**

Project: Viracocha Hill BESS

Technical Staff: Woodruff

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (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.	Section 5.2.6, pp. 5.2-54 and 5.2-55, Appendix 1C.	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.2.7, pp. 5.2-55	No	See DR BIO-18

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A), 1877(a)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 5.3, pp. 5.3-1 to 5.3-2; Section 5.3.2, pp. 5.3-14 to 5.3-16; Section 5.3.3, pp. 5.3-16 to 5.3-19	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates); and	Section 5.3.1, pp. 5.3-2 to 5.3-16; Section 5.3.4, pp. 5.3-19 to 5.3-30	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 5.3.4.1.2, pp. 5.3-22 to 5.3-25; Section 5.3.10 References, pp. 5.3-38 to 5.3-42; Appendix 5.3A Cultural Resources Technical Report - Appendix D, Record Search Results	No	See DR CUL/TRI-1, DR CUL/TRI-2
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference	Section 2.5, pp. 2-32 to 2-34, Figure 2-6; Section 5.3, pp. 5.3-1 to 5.3-4; Section 5.3.5, pp. 5.3-30 to 5.3-32; Section 5.3.7, pp. 5.3-32 to 5.3-37	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features, areas, places, records, sacred places, cultural landscapes, or manuscripts, all of which may have significance according to criteria outlined in sections 21074 and 21084.2 of the Public Resources Code.	---	--	--
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location. This regional summary must address the potential for buried cultural resources and tribal cultural resources to occur in the project area. The summary, together with literature search results, must inform the field methods employed for identifying cultural resources and tribal cultural resources in the project area.	Sections 5.3.1.5, 5.3.1.6, 5.3.1.7, pp. 5.3-5 to 5.3-14; Section 5.3.1.2, pp. 5.3-3 to 5.3-4	Yes	
Appendix B (g) (2) (B)	The results of a literature search to identify cultural resources and tribal cultural resources within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources or tribal cultural	Confidential Appendix 5.3A, Cultural Resources Technical Report, Appendices A–G	No	See DR CUL/TRI-3, DR CUL/TRI-4, DR CUL/TRI-5

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources and tribal cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR §4853) shall be provided for all cultural resources and tribal cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any			

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Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	archaeological excavations or architectural surveys within the literature search area.			
Appendix B (g) (2) (C)	The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources and tribal cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field	Sections 5.3.4.5, 5.3.4.6, pp. 5.3-26 to 5.3-30; 5.3.5.1, pp. 5.3-30 to 5.3-31; Confidential Appendix 5.3A, Cultural Resources Technical Report, Appendices A–G	No	See DR CUL/TRI-6, DR CUL/TRI-7

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

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

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to California Code of Regulations, title 20, section 2501 et seq. At a minimum, the technical report shall include:			
Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	Confidential Appendix 5.3A, Sections 4 and 6; Confidential Appendix 5.3D	Yes	
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural and tribal cultural resources and a discussion of the cultural and tribal resources identified by the survey;	Confidential Appendix 5.3A, Sections 5–6	Yes	
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource or tribal cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	Confidential Appendix 5.3A Cultural Resources Technical Report - Appendix F	Yes	
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Confidential Appendix 5.3A Cultural Resources Technical Report – Appendix A, Figures 4–5	Yes	
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for	Confidential Appendix 5.3A Cultural Resources Technical Report, Section 2.6, Appendix C	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	literature searches, surveys, and preparation of the technical report.			
Appendix B (g) (2) (D) (i)	A copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC.	Confidential Appendix 5.3A Cultural Resources Technical Report, Appendix E	Yes	
Appendix B (g) (2) (D) (ii)	A copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.	Confidential Appendix 5.3A Cultural Resources Technical Report, Appendix E	Yes	
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	Section 5.3.4.3, pp. 5.3-25 to 5.3-26; Confidential Appendix 5.3A Cultural Resources Technical Report, Appendix E	Yes	
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	--	--	--
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	Section 5.3.6, p. 5.3-32; Confidential Appendix 5.3A Cultural Resources Technical Report, Section 8	Yes	
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural and tribal cultural resources and any unanticipated impacts to known cultural or tribal cultural resources; and	Section 5.3.6, p. 5.3-32; Confidential Appendix 5.3A Cultural Resources Technical Report, Section 8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

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

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.	Section 5.3.6, p. 5.3-32	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 5.3.7, pp. 5.3-32 to 5.3-33	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 5.3.8, pp. 5.3-37 to 5.3-38	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	Section 5.3.8, pp 5.3-37 to 5.3-38	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: Cultural Resources and Tribal Cultural Resources

Project: Viracocha Hill BESS

Technical Staff: Patrick Riordan

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.3.9, p. 5.3-38	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Viracocha Hill BESS

Technical Staff: Jacob Locsin

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	N/A	N/A	N/A
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	N/A	N/A	N/A
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	N/A	N/A	N/A
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	Subsection 2.2.3.1, p. 2-24	Yes	
Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Viracocha Hill BESS

Technical Staff: Jacob Locsin

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	with applicable efficiency and operating standards.			
Appendix B (h) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	Section 6.4, pp. 6-5 to 6-6	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: November 2025

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Viracocha Hill BESS

Technical Staff: Jacob Locsin

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Shahab Khoshmashrab

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

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Executive Summary**

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Appendix 1B (TN 261769), Appendix 1B, p.2 (TN 264231)	No	See DR ES-1
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics.	Section 1, p. 1-1 Subsection 1.2, p. 1-1 Subsection 1.3, p. 1-2 Subsection 2.2.1.2, p. 2-2 Subsection 2.2.1.3, p. 2-2 Figure 1-1, p.1-3 Figure 1-4, p.1-6 Figure 2.1, p.2-3	No	See DR HAZ-1
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county, and assessor's parcel numbers.	Subsection 2.2.1.2, p. 2-2 Subsection 1.2, p. 1-1	No	See DR PD-1
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	Figure 1-1, p. 1-3, Figure 1-2, p.1-4 Figure 1-4, p.1-6	No	See DR ES-2
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	Figure 1-2, p. 1-4; Figure 1-3, p. 1-5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Executive Summary**

Project: Viracocha Hill BESS

Technical Staff: Various

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities. Provide the direct mailing addresses for the owners and occupants of properties contiguous to the proposed power plant, related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. Provide a map showing the parcels in the notice area.	Appendix 1A (TN 265066)	Yes	
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	Subsection 1.7, p. 1-7	Yes	
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	Section 1, p. 1-1	Yes	
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	Subsection 3.1, p. 3-1	Yes	
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the	Appendix 3A, Section 1.5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: November 2025
Technical Area: **Executive Summary** Project: Viracocha Hill BESS Technical Staff: Various
Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	persons or entities specified in (a)(3)(A) and (B).			

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Facility Design** Project: Viracocha Hill BESS Revision No. 0 Date: November 2025
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Staff: Jacob Locsin
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (1) (A)	A description of the site conditions and investigations or studies conducted to determine the site conditions used as the basis for developing design criteria. The descriptions shall include, but not be limited to, seismic and other geologic hazards, adverse conditions that could affect the project's foundation, adverse meteorological and climatic conditions, and flooding hazards, if applicable.	Section 1.2, p. 1-1, 1-2 Section 2 and 5 Appendix 2A, p. 2-2, 5-1 thru 5.4-17	Yes	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Section 5.4.4, p. 5.4-9	Yes	
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation), analytical techniques, assumptions, loading conditions, and loading combinations to be	Section 2.2.1.4, p. 2-2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ____
 Technical Area: **Facility Design**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025

Technical Staff: Jacob Locsin

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	used in the design of facility structures and major mechanical and electrical equipment.			
Appendix B (h) (1) (D)	For each of the following facilities or systems, provide a description including drawings, dimensions, surface-area requirements, typical operating data, and performance and design criteria for protection from impacts due to adverse site conditions:	--	--	--
Appendix B (h) (1) (D) (i)	The power generation system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (ii)	The heat dissipation system;			
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	N/A	N/A	N/A
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Section 5.14, p. 5.14-1 through 5.14-4	Yes	
Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	N/A	N/A	N/A
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	Section 2 and 3, p. 2-2, 2-5, 3-1 through 3-6	Yes	
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	Section 2, p. 2-2	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local,	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Facility Design** Project: Viracocha Hill BESS Revision No. 0 Date: November 2025
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Staff: Jacob Locsin
 Technical Senior: Shahab Khoshmashrab

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

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: November 2025
 Technical Area: Geological Hazards Project: Viracocha Hill BESS Technical Staff: Kevin DeLano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Sections 5.4.1 and 5.4.2, pp. 5.4-1 to 5.4-9; Appendix 5.4A Part A (TN 261768); Appendix 5.4A Part B (TN 261774); Appendix 5.15A (TN 261770)	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	Sections 5.4.1 and 5.4.2, pp. 5.4-1 to 5.4-9; Appendix 5.4A Part A (TN 261768); Appendix 5.4A Part B (TN 261774); Appendix 5.4B (TN 261777); Appendix 5.15A (TN 261770)	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.4.8, pp. 5.4-16 to 5.4-17; Appendix 5.4A (TN 261768) p. 15	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Sections 5.4.1 to 5.4.4, pp. 5.4-1 to 5.4-9; Sections 5.4.5.5 to 5.4.5.7, pp. 5.4-14 to 5.4-15;	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: November 2025
 Technical Area: Geological Hazards Project: Viracocha Hill BESS Technical Staff: Kevin DeLano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	Section 5.4.1, pp. 5.4-1 to 5.4-6	Yes	
Appendix B (g) (17) (B)	A map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. Include an analysis of the likelihood of ground rupture, seismic shaking, mass wasting and slope stability, liquefaction, subsidence, tsunami runup, and expansion or collapse of soil structures at the plant site. Describe known geologic hazards along or crossing linear facilities.	Figures 5.4-1 and 5.4-2; Section 5.4.1.3, pp. 5.4-2 to 5.4-6; Section 5.4.2.2, pp. 5.4-7 to 5.4-9; Appendix 5.4A Part A (TN 261768); Appendix 5.4A Part B (TN 261774)	Yes	
Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.	Figure 5.4-1; Section 5.4.1.4, pp. 5.4-6 to 5.4-7, 5.4-9	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: November 2025
 Technical Area: Geological Hazards Project: Viracocha Hill BESS Technical Staff: Kevin DeLano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 5.4.5, pp. 5.4-9 to 5.4-15	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Table 5.4-2, p. 5.4-15	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.	Section 5.4.6, p. 5.4-15	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: November 2025
 Technical Area: Geological Hazards Project: Viracocha Hill BESS Technical Staff: Kevin DeLano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (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 5.4.7, p. 5.4-16	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Hazardous Materials

Paul Miller, Katherine

Technical Area: **Handling**

Project: Viracocha Hill BESS

Technical Staff: Lewis

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.5.2.1, p. 5.5-6; Section 5.5.2.3.1, p. 5.5-10	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 5.5.1.1, pp. 5.5-1 to pp. 5.5-3; Section 5.5.2.1, pp. 5.5-6; Section 5.5.2.3.1, p. 5.5-10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.5.8, p. 5.5-24 to p. 5.5-25	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Sections 5.5.1 through 5.5.5, p. 5.5-1 to p. 5.5-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Hazardous Materials

Technical Area: **Handling**

Project: Viracocha Hill BESS

Technical Staff: Paul Miller, Katherine Lewis

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.	Section 5.5.1.2.1, p. 5.5-2; Section 5.5.1.2.2, p. 5.5-5 to p. 5.5-9; Table 5.5-2	No	DR HAZ-1
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	Section 5.5.1.1, p. 5.5-1 to p. 5.5-4; Table 5.5-1; Figure 5.5-1	No	DR HAZ-2; DR HAZ-3
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Subsection 5.5.1.2.1, p. 5.5-2; Subsection 5.5.1.2.2, 5.5-5 to p. 5.5-9; Table 5.5-2; Table 5.5-3	No	DR HAZ-1
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases that could result in off site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the application is complete.	Section 5.5.2.4 and Section 5.5.2.5, p. 5.5-12 to pp. 5.5-14	Yes	
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) will be required,	Section 5.5.2.4, p. 5.5-11 to pp. 5.5-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Hazardous Materials

Technical Area: **Handling**

Project: Viracocha Hill BESS

Technical Staff: Paul Miller, Katherine Lewis

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and if so, the requirements that will likely be incorporated into the plan.			
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Section 5.5.2.4, p. 5.5-11 to 5.5-12; Section 5.5.4, p. 5.5-15 to p. 5.5-17	Yes	
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	Section 5.5.2.5, p. 5.5-12 to p. 5.5-14	No	DR HAZ-4
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 5.5.5, p. 5.5-17 to p. 5.5-23; Table 5.5-5	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 5.5.6, p. 5.5-23 to p. 5.5-24; Table 5.5-6; Appendix 1D	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Hazardous Materials

Technical Area: **Handling**

Project: Viracocha Hill BESS

Technical Staff: Paul Miller, Katherine Lewis

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (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.	Section 5.5.6, p. 5.5-23 to p. 5.5-24; Table 5.5-6; Appendix 1C	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.5.7, p. 5.5-24 to p. 5.5-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete X Revision No. 0 Date: November 2025
 Technical Area: Land Use Project: Viracocha Hill BESS Technical Staff: Andrea Koch
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.6, pp. 5.6-1 to 5.6-24	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 5.6.1, pp. 5.6-1 to 5.6-8	No	See DR LAND-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.6.8, pp. 5.6-23 to 5.6-24	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to	Sections 5.6.1, 5.6.2, 5.6.3, and 5.6.4, pp. 5.6-1 to 5.6-20	Yes	

DATA COMPLETENESS WORKSHEET

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

Technical Area: Land Use Project: Viracocha Hill BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (3) (A)	A discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	Sections 5.6.1.2, 5.6.1.3, 5.6.1.4, and 5.6.1.5, pp. 5.6-1 to 5.6-8	Yes	
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	Section 5.6.1.5, pp. 5.6-2 to 5.6-8	Yes	
Appendix B (g) (3) (A) (ii)	A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level;	Section 5.6.2.2, pp. 5.6-9 to 5.6-19; Section 5.6.2.2, p. 5.6-17	Yes	
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes	Section 5.6.2.2, p. 5.6-17	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: November 2025
 Technical Area: **Land Use** Project: Viracocha Hill BESS Technical Staff: Andrea Koch
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	or developments identified in subsection (g)(3)(A)(ii); and			
Appendix B (g) (3) (A) (iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.	Figures 5.6-1 and 5.6-2	Yes	
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport	Section 5.6.2.2, pp. 5.6-9 to 5.6-19	No	See DR LAND-3 and DR LAND-4

DATA COMPLETENESS WORKSHEET

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

Technical Area: **Land Use** Project: Viracocha Hill BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Land Use Plan consistency determinations.			
Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single legal parcel. The merger need not occur prior to a decision on the Application but must be completed prior to the start of construction.	Section 1.2, pp. 1-1 to 1-2; Section 2.2.1.2, p. 2-2	Yes	
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	Figure 5.6-3; Section 5.6.1.2, p. 5.6-1; Section 5.6.1.3, p. 5.6-2; Section 5.6.1.5.4, p. 5.6-7	Yes	
Appendix B (g) (3) (D) (i)	Land classifications as shown on the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland maps, crop types, irrigation systems, and any special cultivation practices;	Figure 5.6-3; Section 5.6.1.2, p. 5.6-1; Section 5.6.1.3, p. 5.6-2	Yes	
Appendix B (g) (3) (D) (ii)	Whether agricultural land affected by the project was historically classified	Historical classification not identified	No	See DR LAND-2

DATA COMPLETENESS WORKSHEET

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

Technical Area: **Land Use** Project: Viracocha Hill BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and			
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.	Section 5.6.2.2, pp. 5.6-18 to 5.6-19; Section 5.6.3, p. 5.6-20	No	See DR LAND-1
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 5.6-3, pp. 5.6-10 to 5.6-16; Section 5.6.2.2, p. 5.6-17; Section 5.6.5, pp. 5.6-20 to 5.6-22	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits,	Sections 5.6.6 and 5.6.7, p. 5.6-23	Yes	

DATA COMPLETENESS WORKSHEET

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

Technical Area: **Land Use** Project: Viracocha Hill BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.			
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.	Section 5.6.6, p. 5.6-23	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.6.7, p. 5.6-23	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: November 2025
 Technical Area: **Noise** Project: Viracocha Hill BESS Technical Staff: Ardalan Sofi
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 5.7.1, pp. 5.7-1 to 5.7-3; Subsection 5.7.3, pp. 5.7-6 to 5.7-11;	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 5.7.1, pp. 5.7-1 to 5.7-3; Subsection 5.7.3, pp. 5.7-6 to 5.7-11;	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 5.7.9, pp. 5.7-16 to 5.7-17;	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the	Subsection 5.7.3, pp. 5.7-6 to 5.7-11; Subsection 5.7.4, pp. 5.7-11 to 5.7-12; Subsection 5.7.5, p. 5.7-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Noise** Project: Viracocha Hill BESS Revision No. 0 Date: November 2025
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (4) (A)	A land use map which identifies residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either construction or operation, there is a potential increase of 5 dB(A) or more, over existing background levels.	Figure 5.7-1	No	DR NOISE-1
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature,	Subsection 5.7.2, pp. 5.7-3 to 5.7-6	No	DR NOISE-2

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Technical Area:	Noise	Project:	Viracocha Hill BESS	Technical Staff:
Project Manager:	Eric Veerkamp	Docket:	25-OPT-01	Technical Senior:
				Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L ₁₀ , L ₅₀ , and L ₉₀ values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) shall also be reported in units of dB(A).			
Appendix B (g) (4) (C)	A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.	Subsection 5.7.3, pp. 5.7-6 to 5.7-11	Yes	
Appendix B (g) (4) (D)	An estimate of the project noise levels, during both construction	Subsection 5.7.3, pp. 5.7-6 to 5.7-11	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: November 2025
 Technical Area: **Noise** Project: Viracocha Hill BESS Technical Staff: Ardalan Sofi
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and operation, at residences, hospitals, libraries, schools, places of worship or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.			
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	Subsection 5.7.3, pp. 5.7-6 to 5.7-11	Yes	
Appendix B (g) (4) (F)	The audible noise from existing switchyards and overhead transmission lines that would be affected by the project and estimates of the future audible noise levels that would result from existing and proposed switchyards and transmission lines. Noise levels shall be calculated at the property boundary for switchyards and at the edge of the rights-of-way for transmission lines.	Subsection 5.7.3.3, pp. 5.7-10 to 5.7-11	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a	Table 5.7-11	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: November 2025
 Technical Area: **Noise** Project: Viracocha Hill BESS Technical Staff: Ardalan Sofi
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 5.7-11	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 5.7.7, pp. 5.7-16	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of	Subsection 5.7.8, pp. 5.7-16	Yes	

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Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: November 2025
Technical Area: **Noise** Project: Viracocha Hill BESS Technical Staff: Ardalan Sofi
Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: November 2025
 Technical Area: Paleontological Resources Project: Viracocha Hill BESS Technical Staff: Kevin DeLano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.8.1 and 5.8.2, pp. 5.8-1 to 5.8-7; Appendix 5.8 (TN 264835)	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 5.8.1, pp. 5.8-1 to 5.8-5; Section 5.8.3.1. p. 5-8-7; Appendix 5.8 (TN 264835)	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.8.9, p. 5.8-11 Appendix 5.8 (TN 264835)	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Sections 5.8.1.2.1 to 5.8.1.2.3, pp. 5.8-4 to 5.8-5; Sections 5.8.3 to 5.8.5, pp. 5.8-7 to 5.8-8; Section 5.8.6.3, p. 5.8-10	Yes	

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Completeness: Complete ☒ Incomplete ☐
 Technical Area: **Paleontological Resources** Project: Viracocha Hill BESS Revision No. 0 Date: November 2025
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Staff: Kevin DeLano
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting, formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.	Section 5.8.1.1, p. 5.8-1; Section 5.8.1.2.1, p. 5.8-4	Yes	
Appendix B (g) (16) (B)	A discussion of the sensitivity of the project area described in subsection (g)(16)(A) and the presence and significance of any known paleontological localities or other paleontological resources within or adjacent to the project. Include a discussion of sensitivity for each geologic unit identified on the most recent geologic map at a scale of 1:24,000. Provide rationale as to why the sensitivity was assigned.	Figure 5.8-1; Sections 5.8.2 and 5.8.3, pp. 5.8-5 to 5.8-7	Yes	
Appendix B (g) (16) (C)	A summary of all local museums, literature searches and field surveys used to provide information about paleontological resources in the project area described in (g)(16)(A). Identify the dates of the surveys, methods used in completing the surveys, and the names and qualifications of the individuals conducting the surveys.	Section 5.8.1.2, pp. 5.8-1 to 5.8-2; Appendix 5.8 (TN 264835)	Yes	
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey reports, locality records, and maps at a scale of 1:24,000, showing occurrences of	Figure 5.8-1; Appendix 5.8 (TN 264835)	Yes	

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 Technical Area: Paleontological Resources Project: Viracocha Hill BESS Technical Staff: Kevin DeLano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	fossil finds, if known, within a 1-mile radius of the project and related facilities shall be included in a separate appendix to the Application and submitted to the Commission under a request for confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.			
Appendix B (g) (16) (E)	A discussion of any educational programs proposed to enhance awareness of potential impacts to paleontological resources by employees, measures proposed for mitigation of impacts to known palaeontologic resources, and a set of contingency measures for mitigation of potential impacts to unknown paleontological resources.	Section 5.8.5, p. 5.8-8	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 5.8-3, p. 5.8-9	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce	Sections 5.8.7 and 5.8.8, Table 5.8-4, pp. 5.8-10 to 5.8-11	Yes	

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Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: November 2025
 Technical Area: Paleontological Resources Project: Viracocha Hill BESS Technical Staff: Kevin DeLano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.			
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.	Section 5.8.7, Table 5.8-4, p. 5.8-10	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.8.8, p. 5.8-11	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Project Description**
 Project Manager: **Eric Veerkamp**

Project: **Viracocha Hill BESS**
 Docket: **25-OPT-01**

Revision No. 0 Date: **November 2025**
 Technical Staff: **Ali Jahani**
 Technical Senior: **Kaycee Chang**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide:	-	--	--
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	Confidential Appendix 1A Revised Property Owners	No	See DR PD-1
Public Resources Code, Chapter 6.2, Section 25545.2	...The application shall include evidence that the applicant has sufficient real property rights to the proposed location to currently access, build, and operate the proposed facility	-	No	See DR PD-2
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities to establish the accuracy of the photo simulations required in sections (a)(1)(D) and (g)(6)(F);	Figure 2-1, p.2-3 Figure 2-2, p.2-4	Yes	
Appendix B (b) (1) (C)	A detailed description of the design, methods of construction (include depth of excavations and other ground disturbances) and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety,	Section 2.2.1, pages 2-2 through 2-15 Section 2.2.2, pages 2-15 through 2-24 Figures 2.5a, pages 2-16 Figures 2.5b, pages 2-17 Figures 2.5c, pages 2-18	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Ali Jahani
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	emergency and auxiliary systems, and fuel types and fuel use scenarios; and			
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected, and the consideration given to engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and other factors considered by the applicant.	Section 6, pages 6-1 through 6-6	Yes	
Appendix B (b) (2)	In a section titled, "Transmission Lines Description, Design, and Operation" provide:	-	--	--
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	Figure 1.1, page 1-3 Figure 1.4, page 1-6 Figure 2-1, page 2-3	Yes	
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.	Figure 1.2, page 1-4 Figure 1.3, page 1-5	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	Subsection 2.2.2.3, pages 2-20 through 2-25	Yes	

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Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Ali Jahani
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.			
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints; and	Section 3, pages 3-1 through 3-6 Section 6, pages 6-1 through 6-6	Yes	
Appendix B (b) (2) (E)	A completed System Impact Study or signed System Impact Study Agreement with the California Independent System Operator and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact Study agreement and proof of payment to the interconnecting utility. If the interconnection and operation of the proposed project will likely impact a transmission system that is not controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when	Confidential Appendix 3A	No	See DR TSD-1

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Completeness: Complete ____ Incomplete **X**
 Technical Area: **Project Description**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Ali Jahani
 Technical Senior: Kaycee Chang

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

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Completeness: Complete ____ Incomplete **X**
 Technical Area: **Project Description**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Ali Jahani
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	concentrations of non-condensable gases, and constituent concentrations of dissolved solids, and descriptions and concentrations of any substances potentially harmful to public health and safety or to the environment;			
Appendix B (b) (3) (E)	Proposed locations of production and re-injection wells for the project. Include the applicant's assessment of geothermal resource adequacy, including the production history of those wells within the leaseholds dedicated to the project, including pressure decline curves as available; and	N/A	N/A	N/A
Appendix B (b) (3) (F)	A discussion of the potential impacts on the temperature, mineral content, and rate of flow of thermal springs affected by the project.	N/A	N/A	N/A
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Section 2.2.4, page 2-25 through 2-26	Yes	

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

Technical Area: **Public Health** Project: Viracocha Hill BESS Technical Staff: Tianyi Wang

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 5.9.3.3, Subsection 5.9.3.4, pp. 5.9-4 to 5.9-9.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 5.9.3.5, Subsections 5.9.4 to 5.9.6 pp. 5.9-9 to 5.9-13.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 5.9.10, pp. 5.9-16 to 5.9-17	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Subsections 5.9.1 to 5.9.3, pp. 5.9-1 to 5.9-12.	Yes	

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

Technical Area: **Public Health** Project: Viracocha Hill BESS Technical Staff: Tianyi Wang

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	Subsection 5.9.3.5, pp. 5.9-9 to 5.9-12.	No	See DR PH-1 to DR PH-4
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.	Appendix 5.1A	No	See DR PH-2 and DR PH-3
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.	Subsection 5.9.5, pp. 5.9-13.	Yes	
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	Subsection 5.5, Figure 5.5-1	No	See DR PH-5
Appendix B (g) (9) (E)	For this section, the following definitions apply:	--	--	--

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

Technical Area: **Public Health** Project: Viracocha Hill BESS Technical Staff: Tianyi Wang

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;	Subsection 5.9.2, pp. 5.9-1 to 5.9-2.	Yes	
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and	Subsection 5.9.3, pp. 5.9-2 to 5.9-3	No	See DR PH-4
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.	Subsection 5.9.3.5, Table 5.9-6, p. 5.9-9 Subsection 5.9.3.5, Table 5.9-7, p. 5.9-11	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 5.9.7, pp. 5.9-13 to 5.9-15.	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would	Subsection 5.9.8, p. 5.9-16.	Yes	

DATA COMPLETENESS WORKSHEET

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

Technical Area: **Public Health** Project: Viracocha Hill BESS Technical Staff: Tianyi Wang

Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Wenjun Qian

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 5.9.8, p. 5.9-16	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 5.9.9, p. 5.9-16.	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete Revision No. 0 Date: November 2025
 Technical Area: **Reliability** Project: Viracocha Hill BESS Technical Staff: Ardalan Sofi
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (3) (A)	A discussion of the sources and availability of the fuel or fuels to be used over the estimated service life of the facilities.	N/A	N/A	N/A
Appendix B (h) (3) (B)	A discussion of the anticipated service life and degree of reliability expected to be achieved by the proposed facilities on consideration of:	Subsection 2.2.1.4, p. 2-5; Subsection 2.2.3.1, pp. 2-24 to 2-25; Subsection 2.3.2, p. 2-27; Subsection 2.3.2.1, p. 2-27; Subsection 2.3.2.2, p. 2-27; Subsection 5.4, pp. 5.4-1 to 5.4-9; Subsection 5.15.1.6, p. 5.15-5; Appendix 2A		
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	Subsection 2.2.3, pp. 2-24 – 2-25; Subsection 2.3.1, p. 2-26	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete
Revision No. 0 Date: November 2025
 Technical Area: **Reliability**
Technical Staff: Ardalan Sofi
 Project Manager: Eric Veerkamp
Project: Viracocha Hill BESS
Docket: 25-OPT-01
Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;	Subsection 2.3.1, p. 2-26	Yes	
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	Subsection 5.4, pp. 5.4-1 to 5.4-9; Subsection 5.15.1.6, p. 5.15-5; Appendix 5.4A; Appendix 5.4B	Yes	
Appendix B (h) (3) (B) (iv)	Special design features adopted by the applicant or resource supplier to ensure power plant reliability including equipment redundancy; and	Subsection 2.2.1.4, p. 2-5; Subsection 2.2.3.1, pp. 2-24 to 2-25; Subsection 2.3.2, p. 2-27; Subsection 2.3.2.1, p. 2-27; Subsection 2.3.2.2, p. 2-27; Appendix 2A	Yes	
Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	N/A	N/A	N/A
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with	Table 5.4-1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete
Revision No. 0 Date: November 2025
 Technical Area: **Reliability**
Project: Viracocha Hill BESS Technical Staff: Ardalan Sofi
 Project Manager: Eric Veerkamp
Docket: 25-OPT-01 Technical Senior: Shahab Khoshmashrab

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

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Socioeconomics
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Ellen LeFevre
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.10.2.2 p. 5.10-7, Section 5.10.2.3 pp 5.10-10, 5.10-12	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 5.10.8 pp 5.10-16 – 5.10-18	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 5.1 pp 5.10-1 – 5.10-6, Section 5.2.3 pp 5.10-7 – 5.10-13, Section 5.3 pp. 5.10-14 – 5.10-15	Yes	
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region	Section 5.10.1.1. – 5.10.1.6 pp.5.10-1 – 5.10-6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**
 Technical Area: **Socioeconomics**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025

Technical Staff: Ellen LeFevre

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	affected by construction and operation of the project. Include:			
Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;	Section 5.10.1.3 pp. 5.10-2 – 5.10-3. Section 5.10.4 pp 5.10-3 – 5.10-4. Tables 5.10-4 – Table 5.10-6	Yes	
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	Section 5.10.1 pp.5.10-1 – 5.10-2, Tables 5.10-1, 5.10-2, Appendix 5.10A	Yes	
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	Section 5.10.1.3 Table 5.10-5 p. 5.10-3	No	See DR SOCIO-1
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for construction and operation of the project;	Section 5.10.2.3 Table 5.10-10 p. 5.10-9	Yes	
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	Section 5.10.1.2 Table 5.10-3 p. 5.10-2	Yes	
Appendix B (g) (7) (A) (vi)	Capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule.	Section 5.10.1.7 p. 5.10-6 Section 5.10.1.6 pp. 5.10-5 – 5.10-6 Section 5.10.1.5 pp. 5.10-4 – 5.10-5	No	See DR SOCIO-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Socioeconomics
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Ellen LeFevre
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note year of estimate, model, if used, and appropriate sources), including:	Section 5.10.2.3 pp. 5.10-7 – 5.10-11 Section 5.10.2.4 pp. 5.10-11 – 5.10-13	Yes	
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number of permanent operations workers during a year;	Section 5.10.2.3 Table 5.10-8 p. 5.10-8 Section 5.10.2.4 p. 5.10-11	Yes	
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work during the project construction and operation;	Section 5.10.2.3 p. 5.10-9 Section 5.10.2.4 p. 5.10-11	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	Section 5.10.2.3 pp. 5.10-7 – 5.10-9 Section 5.10.2.4 pp. 5.10-11 – 5.10-12	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	Section 5.10.2.3 pp. 5.10-7 – 5.10-9 Section 5.10.2.4 pp. 5.10-11 – 5.10-12	Yes	
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. For projects outside	Section 5.10.2.3 p. 5.10-11, Section 5.10.2.4 p. 5.10-13 Appendix 5.10B	No	See DR SOCIO-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: Socioeconomics

Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS

Docket: 25-OPT-01

Revision No. 0 Date: November 2025

Technical Staff: Ellen LeFevre

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating -phases;			
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	Section 5.10.2.4 p. 5.10-13	Yes	
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	Section 5.10.2.3 p. 5.10-10 Section 5.10.2.4 p. 5.10-12	Yes	
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	Section 5.10.2.3 p. 5.10-10 Section 5.10.2.4 p. 5.10-12	Yes	
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	Section 5.10.2.3 p. 5.10-10	Yes	
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	Section 5.10.2.3 p. 5.10-11 Section 5.10.2.4 p. 5.10-12	Yes	
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	Section 5.10.2.4 p. 5.10-12	Yes	
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment effects due to construction and operation of the project; and	Section 5.10.2.3 p. 5.10-10 Section 5.10.2.4 p. 5.10-12	Yes	
Appendix B (g) (7) (B) (xiii)	A discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations.	Section 5.10.2.4 pp. 5.10-13 – 5.10-14	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional,	Section 5.10-12 pp. 5.10-14 – 5.10-15	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**
 Technical Area: **Socioeconomics**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Ellen LeFevre
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
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.	Section 5.10-12 pp. 5.10-14 – 5.10-15	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.	Section 5.10.6 p. 5.10-16	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.10.7 p.5.10-16	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: Soils

Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS

Docket: 25-OPT-01

Revision No. 0 Date: November 2025

Technical Staff: Kevin Delano

Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Sections 5.11.1 to 5.11.3, pp. 5.11-1 to 5.11-9; Appendix 5.4A Part A (TN 261768); Appendix 5.4A Part B (TN 261774); Appendix 5.15A (TN 261770)	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	Sections 5.11.1 to 5.11.3, pp. 5.11-1 to 5.11-9; Appendix 5.4A Part A (TN 261768); Appendix 5.4A Part B (TN 261774); Appendix 5.15A (TN 261770)	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.11.8, pp. 5.11-16 to 5.11-17	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the	Sections 5.11.1 to 5.11.4, pp. 5.11-1 to 5.11-10; Table 5.11-3, p. 5.11-12; Section 5.11.5.3.5, p. 5.11-15	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Soils Project: Viracocha Hill BESS Revision No. 0 Date: November 2025
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Staff: Kevin Delano
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (15) (A)	A map at a scale of 1:24,000 and written description of soil types and all agricultural land uses that will be affected by the proposed project. The description shall include:	Figure 5.11-1; Sections 5.11.1 and 5.11.2, pp. 5.11-1 to 5.11-8	Yes	
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;	Sections 5.11.1.2 and 5.11.1.3, Table 5.11-1, pp. 5.11-1 to 5.11-4; Section Table 5.6-3, p. 5.6-10; 5.6.2.2, 5.6-19	Yes	
Appendix B (g) (15) (A) (ii)	An identification of other physical and chemical characteristics of the soil necessary to allow an evaluation of soil erodibility, permeability, re-vegetation potential, and cycling of pollutants in the soil-vegetation system;	Sections 5.11.1.2 and 5.11.1.3, Table 5.11-1, pp. 5.11-1 to 5.11-4	Yes	
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and	Section 5.11.2.2.1, pp. 5.11-5 to 5.11-7	Yes	
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	Section 5.11.1, pp. 5.11-1 to 5.11-4	No	See DR SOILS-1
Appendix B (g) (15) (B)	An assessment of the effects of the proposed project on soil resources and agricultural land uses. This discussion shall include:	Section 5.11.1.4, p. 5.11-4; Section 5.11.2.3, p. 5.11-8	Yes	
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and	Section 5.11.2.1, p. 5.11-5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: November 2025
 Technical Area: Soils Project: Viracocha Hill BESS Technical Staff: Kevin Delano
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.	Section 5.11.2.3.3, p. 5.11-8	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 5.11-3, pp. 5.11-10 to 5.11-12	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 5.11.5.3.5, p. 5.11-15; Table 5.11-4, p. 5.11-16	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 5.11-4, p. 5.11-16	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Soils Project: Viracocha Hill BESS Revision No. 0 Date: November 2025
 Project Manager: Eric Veerkamp Docket: 25-OPT-01 Technical Staff: Kevin Delano
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (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 5.11.7, p. 5.11-16	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: **Traffic and Transportation**

Project: Viracocha Hill BESS

Technical Staff: Bill Burton, Ashlee Takushi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.12.1.1.4, pp. 5.12-4 to 5.12-6.	No	See DR TRANS-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 5.12.1, pp: 5.12-1 to 5.12-9; Section 5.12.2, pp: 5.12-9 to 5.12-18.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.12.6.3, pp: 5.12-30 to 5.12-31; Section 5.12.9, p: 5.12-33.	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Section 5.12.1, pp: 5.12-1 to 5.12-9; Section 5.12.2, pp: 5.12-9 to 5.12-18, Section 5.12.4, pp: 5.12-18 to 5.12-24; Section 5.12-5, p: 5.12-24.	No	See DR TRANS-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: Traffic and Transportation

Project: Viracocha Hill BESS

Technical Staff: Bill Burton, Ashlee Takushi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	Section 5.12.1, Figure 5.12-1 and Figure 5.12-2.	Yes	
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include:	Section 5.12.1.6, p: 5.12-9	No	See DR TRANS-3
Appendix B (g) (5) (B) (i)	A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the	Section 5.12.1.6, p: 5.12-9	No	See DR TRANS-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: **Traffic and Transportation**

Project: Viracocha Hill BESS

Technical Staff: Bill Burton, Ashlee Takushi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	proposed power plant site and related facilities.			
Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	Section 5.12.1.6, p: 5.12-9	No	See DR TRANS-3
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and	Section 5.12.1.6, p: 5.12-9	No	See DR TRANS-3
Appendix B (g) (5) (B) (iv)	Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.	Section 5.12.1.6, p: 5.12-9	No	See DR TRANS-3
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	Section 5.12.2.4, p: 5.12-17	No	See DR TRANS-4
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	Section 5.12.2.4, p: 5.12-17	No	See DR TRANS-4
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	Section 5.12.2.4, p: 5.12-17	No	See DR TRANS-4
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	Section 5.12.2.4, p: 5.12-17	No	See DR TRANS-4
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	Section 5.12.2.4, p: 5.12-17	No	See DR TRANS-4
Appendix B (g) (5) (D)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed	Section 5.12.1, Figure 5.12-2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Traffic and Transportation**

Project: Viracocha Hill BESS

Technical Staff: Bill Burton, Ashlee Takushi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	facility. For each road identified, include the following, where applicable:			
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	Section 5.12.1, pp: 5.12-1 to 5.12-8	No	See DR TRANS-5
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	Section 5.12.1.1.4, pp: 5.12-1 to 5.12-7	No	See DR TRANS-2
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	Section 5.12.1.1.4, pp: 5.12-1 to 5.12-7; Section 5.12.2.1.1, pp: 5.12-9 to 5.12-15	No	See DR TRANS-2
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	Section 5.12.1.2, p: 5.12-8	Yes	
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	Section 5.12.1.1.4, pp: 5.12-4	No	See DR TRANS-2
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.	Section 5.12.1, pp: 5.12-1 to 5.12-9; Section 5.12.2.5, p: 5.12-17	Yes	
Appendix B (g) (5) (E)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include:	Section 5.12.2, pp: 5.12-9 to 5.12-15	No	See DR TRANS-2
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul trips	Not provided	No	See DR TRANS-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Traffic and Transportation**

Project: Viracocha Hill BESS

Technical Staff: Bill Burton, Ashlee Takushi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	generated by the construction of the project.			
Appendix B (g) (5) (E) (ii)	Description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities.	Section 5.12.2.3.1, p: 5.12-16; Section 5.12.2.5, p: 5.12-17	Yes	
Appendix B (g) (5) (F)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.	Section 5.12.3, p: 5.12.18	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 5.12.6, Table 5.12-9, pp: 5.12-24 to 5.12-30	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and	Section 5.12.8, Table 5.12-11, pp: 5.12-32 to 5.12-33	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Traffic and Transportation**

Project: Viracocha Hill BESS

Technical Staff: Bill Burton, Ashlee Takushi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 5.12-7, Table 5.12-10, pp: 5.12-31 to 5.12-32	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.12-8, Table 5.12-11, pp: 5.12-32 to 5.12-33	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐

Revision No. 0 Date: November 2025

Technical Area: **Transmission System**

Project Manager: **Safety and Nuisance**

Project: Viracocha Hill BESS

Docket: 25-OPT-01

Technical Staff: Sudath Edirisurya

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Sections 2.1 to 2.4 Sections 3.4 to 3.5 Figure 4-1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐

Revision No. 0 Date: November 2025

Technical Area: **Transmission System**

Project Manager: **Safety and Nuisance**

Project: Viracocha Hill BESS

Docket: 25-OPT-01

Technical Staff: Sudath Edirisurya

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	Sections 2.1 to 2.4 Sections 3.1 to 3.5 Figures 2-1,2-2, 4-1	Yes	
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.	Sections 2.1 to 2.4 Sections 3.4 to 3.5 Figures 2-1,2-2, 4-1	Yes	
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.	Sections 2.1 to 2.4 Sections 3.4 to 3.5	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the but could proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the	Appendix A6 Section 2.6	Yes	

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Completeness: Complete ☒ Incomplete ☐

Revision No. 0 Date: November 2025

Technical Area: **Transmission System**

Project Manager: **Safety and Nuisance**

Project: Viracocha Hill BESS

Docket: 25-OPT-01

Technical Staff: Sudath Edirisurya

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	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.	Appendix A6	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.	Appendix 1B	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: **Transmission System Design**

Project: Viracocha Hill BESS

Technical Staff: Usama Khalid/Laiping Ng

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (h) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	Section 2.1, p. 2-1 Section 2.2.2.3, p. 2-20	No	See DR TSD-2 See DR TSD-3 See DR TSD-4
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	Section 2.2.3.2, p. 2-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: **Transmission System**

Design

Project: Viracocha Hill BESS

Technical Staff: Usama Khalid/Laiping Ng

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	generating facilities planned by the applicant or any other entity.			
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 2.2.2.3, p. 2-20 Section 2.2.3.2, p. 2-25 Section 3, p 3-1 to p. 3-2 Figure 3-1, Figure 3-2	No	See DR TSD-5
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints.	Section 2.1 Section 2.2	No	See DR TSD-3 See DR TSD-4
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall	Section 2.6	No	See DR TSD-6

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: **Transmission System**

Design

Project: Viracocha Hill BESS

Technical Staff: Usama Khalid/Laiping Ng

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Shahab Khoshmashrab

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

Completeness: Complete **X** Incomplete
 Technical Area: **Visual Resources**
 Project Manager: Eric Veerkamp

DATA COMPLETENESS WORKSHEET

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Mark Hamblin
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.13.3, pp. 5.13-6-12.	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	NA	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.13.8, pp. 5-13-39-40.	Yes	
Appendix B (g) (1)	... provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation, and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection (or a combination of) used to develop the cumulative setting for the proposed project. Include any	Section 5.13.1.2-3, pp. 5.13-4-6. Section 5.13.2.2, pp. 5.13-12-15. Section 5.13.2.3, pp.5.13-15-32.	Yes	

Completeness: Complete **X** Incomplete _____
 Technical Area: **Visual Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Viracocha Hill BESS**
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Revision No. **0** Date: **November 2025**
 Technical Staff: **Mark Hamblin**
 Technical Senior: **Eric Knight**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (6) (A)	Provide a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity, and along the proposed routes for any aboveground project-related linear facilities. Include:	Section 5.13.1.2, p. 5.13-4. Section 5.13.1.3, p. 5.13-6.	Yes	
Appendix B (g) (6) (A) (i)	Show on a map(s) (pinpoint) any designated or recognized scenic vista and scenic resource within a five-mile radius of the project and one-mile radius of a project-related linear facility. Include:	Figure 5.13-1, p. 5.13-5. Figure 5.13-2, p. 5.13-7.	Yes	
Appendix B (g) (6) (A) (i) a.	Any designated scenic vista and scenic resource in an adopted federal, state, county, or city government planning document, plan, or regulation.	Section 5.13.1.1, Table 5.13-1, pp. 5.13-2-4.	Yes	
Appendix B (g) (6) (A) (i) b.	A natural feature or object that is a part of the land, such as a geologic distinguishing characteristic (e.g., laccolith), geomorphologic feature (e.g., gorge), or other terrain feature (e.g., a water body, open space, or a tree recognized for its aesthetic, botanical and ecological value, or age, rarity, and size).	Same as above.	Yes	
Appendix B (g) (6) (A) (i) c.	A man-made feature or object that embodies elements of architecture or engineering design, detail, materials or	Same as above.	Yes	

Completeness: Complete **X** Incomplete _____
 Technical Area: **Visual Resources**
 Project Manager: **Eric Veerkamp**

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Project: **Viracocha Hill BESS**
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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	craftsmanship that represent a significant innovation or is unique, such as the California State Capitol, Golden Gate Bridge, or Hollywood Sign.			
Appendix B (g) (6) (A) (i) d.	Explain does the project eliminate or obstruct the public view (the visible area from a location where the public has a legal and physical right of access to real property) of a scenic vista and scenic resource? Is the project situated so that it changes the visual aspect of a scenic resource by being different or in sharp contrast?	Section 5.13.2.3, p. 5.13-15.	Yes	
Appendix B (g) (6) (A) (ii)	Describe the existing nighttime lighting on the project site and in the vicinity.	Section 5.13.1.2, p. 5.13-4.	Yes	
Appendix B (g) (6) (B)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within an "urbanized area" as defined in Public Resources Code section 21071, explain the project's conformance with the city/county General Plan, and city municipal code or county government code (e.g., zoning) governing scenic quality.	NA	Yes	
Appendix B (g) (6) (C)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to	Section 5.13.1.	Yes	

Completeness: Complete **X** Incomplete _____
 Technical Area: **Visual Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Viracocha Hill BESS**
 Docket: **25-OPT-01**

Revision No. **0** Date: **November 2025**
 Technical Staff: **Mark Hamblin**
 Technical Senior: **Eric Knight**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	be constructed within a non-urbanized area provide the following:			
Appendix B (g) (6) (C) (i)	Show on a map the pinpoint location of the key observation point(s) (KOP) for the project. A KOP is a fixed position in a publicly accessible location where a public view of the project is analyzed and/or evaluated in the landscape. Objects of aesthetic significance are the primary focus in the KOP selection.	Figure 5.13-2, p. 5.13-7.	Yes	
Appendix B (g) (6) (C) (ii)	If an object of aesthetic significance is not in the vicinity of the project, a KOP is to be selected based on importance to stakeholders, visibility, direct public selection, worst-case scenario, or other reason. Explain the reason the KOP was chosen. At a minimum two KOPs are to be selected.	NA	Yes	
Appendix B (g) (6) (C) (iii)	Provide a color photograph(s) showing an actual line of sight at eye level during daytime and clear weather from the KOP to the project site prior to any alteration (existing condition). The photographer at the KOP is to use a standard lens. For each photograph provide the following information: camera type, lens focal length, viewing angle; date and time the photograph was taken, and the distance to the project site.	Figure 5.13-3a, p. 5.13-15-37. Section 5.13.2.1, p. 5.13-6.	Yes	
Appendix B (g) (6) (C) (iv)	Using the photograph from the KOP provide a spatially accurate and	Figure 5.13-3b, p. 5.13-15-38.	Yes	

Completeness: Complete **X** Incomplete _____
 Technical Area: **Visual Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Viracocha Hill BESS**
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Revision No. **0** Date: **November 2025**
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 Technical Senior: **Eric Knight**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	realistically photo manipulated computer simulated image of the project (photo-realistic simulation) one-year after completion of construction (existing condition plus proposed project).			
Appendix B (g) (6) (C) (v)	The KOP photograph and the photo-realistic simulation are to be capable of 11" x 17" color print by a printer capable at a minimum 600 dots per inch output resolution.	Figure 5.13-3a, p. 5.13-15-37. Figure 5.13-3b, p. 5.13-15-38.	Yes	
Appendix B (g) (6) (C) (vi)	Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file.	Electronic file submitted with application.	Yes	
Appendix B (g) (6) (D)	Show and describe the project in the landscape.	Section 5.13.2.2, p. 5.13-12-13. Section 1, Figure 1-2, p. 1-4.	Yes	
Appendix B (g) (6) (D) (i)	Provide an 8.5" x 11" sized scaled elevation(s) of project buildings, structures, and major equipment; a table listing their dimensions (height, length, width, diameter).	Section 2.2.1.4.1, Figure 2-2, p. 2-4. Section 3.3.2, Figure 3-1, p. 3-3. Section 5.13.2.2, pp. 5.13-12-13.	Yes	
Appendix B (g) (6) (D) (ii)	Provide a table and description of the exterior surface treatments and finishes for the buildings, structures, major equipment (e.g., colors, flat and/or textured finishes), and structural materials.	Section 5.13.2.2, pp. 5.13-12-13.	Yes	
Appendix B (g) (6) (D) (iii)	Describe project specific architectural treatment or design technique mitigation unique to the project's siting at the location (e.g., camouflage, disguise, screen), if any.	NA	Yes	

Completeness: Complete **X** Incomplete _____
 Technical Area: **Visual Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Viracocha Hill BESS**
 Docket: **25-OPT-01**

Revision No. **0** Date: **November 2025**
 Technical Staff: **Mark Hamblin**
 Technical Senior: **Eric Knight**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (6) (D) (iv)	Provide a project specific conceptual landscape design plan that conforms with the city municipal code or county government code. Include:	NA	Yes	
Appendix B (g) (6) (D) (iv) a.	the type of plant and/or tree species, location, quantity, size, spacing at installation/planting, expected growth rates, and expected heights at one-year, five years, and maturity. Specify irrigation system components and show their locations.	NA	Yes	
Appendix B (g) (6) (D) (iv) b.	the calculated total pervious surface amount for the project site; include the surface to be replaced, the new surface, and the total area to be landscaped.	NA	Yes	
Appendix B (g) (6) (D) (v)	Provide a project specific conceptual outdoor lighting control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.	Section 2.2.1.4, p. 2-11. Section 5.2.4.4, p. 5.2-46. Section 5.13.2, p. 5.13-12-14. Section 5.13.2, p. 32. Section 5.13.2.4, p. 5.13-34. Section 5.13.2.4, p. 5.13-33.	Yes	
Appendix B (g) (6) (D) (v) a.	Provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non-cutoff) and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the	Section 2.2.1.4, p. 2-8-9 Section 5.14.1.2, p. 5.14-3. Section 5.14.1.2, p. 5.14-4. Section 5.13.2, p. 5.13-32. Section 5.13.2, p. 5.13-34. Section 5.13.8, p. 5.13-39.	Yes	

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 Project Manager: **Eric Veerkamp**

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	project-specific luminaires locations on a diagram or elevation.			
Appendix B (g) (6) (D) (v) b.	Describe reflectance, the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment offsite to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object—how bright it shines—depends on the intensity of the light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel).	Section 5.13.2.2, pp. 5.13-12-13.	Yes	
Appendix B (g) (6) (E)	If the project is to use a cooling tower emitting a publicly visible water vapor plume (visible plume) in the atmosphere provide the following information:	NA	Yes	
Appendix B (g) (6) (E) (i)	Provide the cooling tower's number of fan cells, the fan cell stack height and diameter, the exhaust mass flow rate, heat rejection rate, and exhaust temperature.	NA	Yes	
Appendix B (g) (6) (E) (ii)	Provide fogging curves specific to the cooling tower's exhaust discharge for at least three ambient air temperature conditions (a low, average, and high temperature condition).	NA	Yes	
Appendix B (g) (6) (E) (iii)	Explain if the project's forecasted visible plume emitted in the atmosphere by the	NA	Yes	

Completeness: Complete **X** Incomplete _____
 Technical Area: **Visual Resources**
 Project Manager: **Eric Veerkamp**

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 Technical Senior: **Eric Knight**

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	cooling tower would eliminate or obstruct an existing public view of a designated or recognized scenic vista, scenic resource, and the existing visual character or quality of public views of the site and its surroundings.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 5.13.5, pp. 5.13-35-36.	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Section 5.13.2.4, Table 5.13-3, pp. 5.13-32-34. Section 5.13.6, Table 5.13-14, p. 5.13-39.	Yes	

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 Technical Area: **Visual Resources**
 Project Manager: Eric Veerkamp

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 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff.	Section 5.13.6, Table 5.13-14, p. 5.13-39.	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.13.6, Table 5.13-14, p. 5.13-39.	Yes	

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Completeness: Complete Incomplete **X**
 Technical Area: **Waste Management**
 Project Manager: Eric Veerkamp

Revision No. 0 Date: November 2025

Project: Viracocha Hill BESS Technical Staff: Nick Kehrlein, Michele Shi
 Docket: 25-OPT-01 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Appendix 5.14A	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Appendix 5.14A	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.14.8 p. 5.14-16 to 5.14-17;	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 5.14.1 p. 5.14-1 to 5.14-4; Appendix 5.14A;	Yes	

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Completeness: Complete Incomplete **X**
 Technical Area: **Waste Management**
 Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
 Docket: 25-OPT-01

Revision No. 0 Date: November 2025
 Technical Staff: Nick Kehrlein, Michele Shi
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment (ESA) for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination. The Phase I ESA shall have been completed no earlier than one year prior to the filing of the application.	Appendix 5.14A	Yes	
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.	Section 5.14.1.2 p. 5.14-1 to 5.14-4	No	DR WASTE-1
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under California Code of Regulations, Title 23, section 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and	Table 5.14-3 p. 5.14-7; Section 5.14.2.3 p. 5.14-5 to 5.14-8; Section 5.14.2.4 p. 5.14-8	Yes	

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Completeness: Complete Incomplete **X**
 Technical Area: **Waste Management**
 Project Manager: Eric Veerkamp

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.			
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.	Section 5.14.2.3 p. 5.14-5 to 5.14-8; Section 5.14.2.4 p. 5.14-8	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 5.15-4 p. 5.14-12 to 5.14-14; Section 5.14.5 p. 5.14-12 to 5.14-15;	No	WASTE-2
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 5.14-5 p. 5.14-16	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of	Table 5.14-5 p. 5.14-16	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Waste Management**

Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS

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Revision No. 0 Date: November 2025

Technical Staff: Nick Kehrlein, Michele Shi

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 5.14.7 p. 5.14-16;	Yes	

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: Eric Veerkamp

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Revision No. 0 Date: November 2025
 Technical Staff: Nick Kehrlein
 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Appendix 5.15-A p. 18 to 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	Appendix 5.15-A p. 18 to 40;	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.15.7 p. 5.15-20 to 5.15-21	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Sections 5.15.1 to 5.15.4 p. 5.15-1 to 5.15-12;	Yes	
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:	--	--	--

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: Eric Veerkamp

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 Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);	N/A		
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	N/A		
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	N/A		
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A		
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The information shall include a narrative discussion and on maps at a scale of 1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:	Figure 5.15-1 p. 5.15-4, Figure 5.15-2 p. 5.15-6, Figure 5.15-3 p. 5.15-7; 5.15.1 p. 5.15 to 5.15-8	No	DR WATER-1
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Figure 5.15-2 p. 5.15-6; Section 5.15.1.5 p. 5.15-5; Fire 5.4-1 p. 5.4-3;	Yes	
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Figure 5.15-1 p. 5.15-5; Section 5.15.1.3 p. 5.15-2;	No	DR WATER-1
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	Figure 5.15-3 p. 5.15-7; Section 5.15.1.6 p. 5.15-5;	Yes	

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: Eric Veerkamp

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	Section 5.15.2.3.2 p. 5.15-10	Yes	
Appendix B (g) (14) (B) (v)	Groundwater wells within ½ mile if the project will include pumping.	Figure 5.15-2 p. 5.15-6	N/A	
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	--	--	--
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	Section 5.15.1.7 p. 5.15-5	Yes	
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment. For source waters with seasonal variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of background material used to create this description (that is, laboratory analysis);	Section 5.15.2.1 p. 5.15-8 to 5.15-9	No	DR WATER-2
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	Section 5.15.2.1 p. 5.15-8 to 5.15-9	Yes	
Appendix B (g) (14) (C) (iv)	A detailed description of all facilities to be used in water conveyance (from primary source to the power plant site), water treatment, and wastewater discharge. Include a water mass balance diagram;	Section 5.15.2.1 p. 5.15-8 to 5.15-9; Appendix 5.15-A p. 18 to 40;	No	DR WATER- 4
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private	Section 5.15.2.1 p. 5.15-8 to 5.15-9;	No	DR WATER- 4

Completeness: Complete ____ Incomplete **X**
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	water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary assurances from the water purveyor to serve the project;			
Appendix B (g) (14) (C) (vi)	For all water supplied which necessitates transfers and/or exchanges at any point, identify all parties and contracts/agreements involved, the primary source for the transfer and/or exchange water (that is, surface water, groundwater), and provide the status of all appropriate agencies' approvals for the proposed use, environmental impact analysis on the specific transfers or exchanges required to obtain the proposed supplies, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agency regulation(s);		No	DR WATER-4
Appendix B (g) (14) (C) (vii)	Provide water mass balance and heat balance diagrams for both average and maximum flows that include all process or ancillary water supplies and wastewater streams. Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and	N/A		

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

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 Technical Senior: **Karim Abulaban**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (C) (viii)	For all projects which have a discharge, provide a copy of the will-serve letter, permit or contract with the public or private entity that will be accepting the wastewater and contact storm water from the project. The letter, permit or contract, if possible, shall identify the discharge volumes and the chemical or physical characteristics under which the wastewater and contact storm water will be accepted. In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.	N/A		
Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	--	--	--
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area	Table 5.15-1 p. 5.15-2; Figure 5.15-1 P. 5.15-4; Section 5.15.1.8	Yes	

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

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 Technical Senior: **Karim Abulaban**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	that may be affected by the project's construction and operation;	p. 5.15-5; Section 5.15.2.3 p. 5.15-9 to 5.15-10;		
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;	Section 5.15.2.3 p. 5.15-9 to 5.15-10; Appendix 5.15-A p. 18 to 40;	Yes	
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and	Appendix 5.15-A p. 18 to 40;	Yes	
Appendix B (g) (14) (D) (iv)	A copy of applicable regional and local requirements regulating the drainage systems, and a discussion of how the project's drainage design complies with these requirements.	Section 5.15.2.3 p. 5.15-9 to 5.15-11; Section 5.15.5.2 p. 5.15-17 to 5.15-19;	Yes	
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	--	--	--
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	Section 5.15.2.1 p. 5.15-8	Yes	
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a	N/A		

Completeness: Complete ____ Incomplete **X**
 Technical Area: **Water Resources**
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	computer modeling study shall be conducted by a professional geologist and include the estimated drawdown on neighboring wells within 0.5 mile of the proposed well(s), any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical conditions of groundwater resources shall be provided;			
Appendix B (g) (14) (iii)	The effects of construction activities and plant operation on water quality and to what extent these effects could be mitigated by best management practices;	Section 5.15.2.3 p. 5.15-9 to 5.15-11; Appendix 5.15-A p. 13 to 15;	No	DR WATER-3
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"	N/A		
Appendix B (g) (14) (v)	If using fresh water, include a discussion of the cumulative impacts, alternative water supply sources and alternative cooling technologies considered as part of the project design. Include an explanation of why alternative water supplies and alternative cooling are "environmentally undesirable," or "economically unsound;"	Section 5.15.1.7 p. 5.15-5;	Yes	
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent	Section 5.15.2.4 p. 5.15-11; Figure 5.15-3 p. 5.15-7;	Yes	

Completeness: Complete ____ Incomplete **X**
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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	lands or water bodies, or other water inundation zones; and			
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	Section 5.15-2 p. 5.15-8 to 5.15-11; Appendix 5.15-A p. 7 to 15;	No	DR WATER-5
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Table 5.15-2 p. 5.15-13	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Table 5.15-3 p. 5.15-20	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 5.15-3 p. 5.15-20	Yes	

Completeness: Complete ____ Incomplete **X**
Technical Area: **Water Resources**
Project Manager: Eric Veerkamp

DATA ADEQUACY WORKSHEET

Project: Viracocha Hill BESS
Docket: 25-OPT-01

Revision No. 0 Date: November 2025

Technical Staff: Nick Kehrlein
Technical Senior: Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Table 5.15-3 p. 5.15-20	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: Wildfire

Project: Viracocha Hill BESS

Technical Staff: Paul Miller, Katherine Lewis, Michele Shi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.16 Subsection 5.16.1, p. 5.16-1 to p. 5.16-6; Subsection 5.16.2, p. 5.16-6 to p. 5.16-10; Subsection 5.16.3, p. 5.16-10; Subsection 5.16.5, p. 5.16-11 to p. 5.16-19	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 5.16 Subsection 5.16.1, p. 5.16-1 to p. 5.16-6; Subsection 5.16.2, p. 5.16-6 to p. 5.16-10; Subsection 5.16.3, p. 5.16-10; Subsection 5.16.5, p. 5.16-11 to p. 5.16-19	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 5.16, Subsection 5.16.8, p. 5.16-20 to p. 5.16-21	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 5.16, Subsection 5.16.1, p. 5.16-1 to p. 5.16-6; Subsection 5.16.2.2, p. 5.16-6 to p. 5.16-10; Subsection 5.16.3, p. 5.16-10; Subsection 5.16.4, 5.16-11	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Wildfire**

Project: Viracocha Hill BESS

Technical Staff: Paul Miller, Katherine Lewis, Michele Shi

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (19) (A)	A map showing State Responsibility Areas (SRA,) as defined in Public Resources Code section 4102, relative to the proposed project.	Subsection 5.16.1 Figure 5.16-1, p. 5.16-4	Yes	
Appendix B (g) (19) (B)	A map showing state Fire Hazard Severity Zones, as defined in 14 CCR section 1280.01, relative to the proposed project.	Subsection 5.16.1 Figure 5.16-2, p. 5.16-5	Yes	
Appendix B (g) (19) (C)	If the project would be in the vicinity of an SRA or a Very High Fire Hazard Severity Zone, as defined in 14 CCR section 1265.00, provide:	--	--	--
Appendix B (g) (19) (C) (i)	Local emergency response or evacuation plans and a description of how the proposed project could influence their effectiveness.	Subsection 5.16.1 Subsection 5.16.2, Table 5.16-1, p. 5.16-7	Yes	
Appendix B (g) (19) (C) (ii)	A discussion of how potential project pollutants could be contained onsite during a wildfire event.	Subsection 5.16.1 Subsection 5.16.2, p. 5.16-8 to p. 5.16-9	No	DR WF-1
Appendix B (g) (19) (C) (iii)	A description of infrastructure that would be built or maintained (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate the risk of wildfire.	Subsection 5.16.1 Subsection 5.16.2, p. 5.16-9	Yes	
Appendix B (g) (19) (C) (iv)	Describe people or structures downslope or downstream of the proposed project that could be impacted by flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Subsection 5.16.1 Subsection 5.16.2, p. 5.16-10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Worker Safety**
Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
Docket: 25-OPT-01

Technical Staff: Michele Shi/Alvin Greenberg
Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 5.17 Subsection 5.17.2.4 Subsection 2.2.1.4	No	See DR WS-18 to DR WS-21
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 5.17 Subsection 5.17.2.4 Subsection 2.2.1.4	No	See DR WS-18 to DR WS-21
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 5.17 Subsection 5.17.6	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Section 5.17 Subsection 5.17.1 Subsection 5.17.2 Subsection 5.16.1.8	No	See DR WS-10 to DR WS-14, DR WS-24

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Worker Safety**
Project Manager: Eric Veerkamp

Project: Viracocha Hill BESS
Docket: 25-OPT-01

Technical Staff: Michele Shi/Alvin Greenberg
Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Subsection 5.17.2.3	No	See DR WS-7
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Section 5.17 Subsection 5.17.2.4 Subsection 2.2.1.4 Subsection 5.5.2.5	No	See DR WS-15 to DR WS-17 and DR WS-22 to DR WS-23
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	--	--	--
	Construction Health and Safety Program: • Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);	Subsection 5.17.2.3.1	Yes	
	• Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);	Subsection 5.17.2.3.1 Subsection 5.17.2.4	No	See DR WS-4
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)	Subsection 5.17.2.3.1	Yes	
	Operation Health and Safety Program: • Injury and Illness Prevention Program (8 Cal. Code Regs., §3203);	Subsection 5.17.2.3.2	Yes	
	• Fire Prevention Plan (8 Cal. Code Regs., § 3221);	Subsection 5.17.2.3.2 Subsection 5.17.2.4	No	See DR WS-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: November 2025

Technical Area: Worker Safety

Project: Viracocha Hill BESS

Technical Staff: Michele Shi/Alvin Greenberg

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	- Emergency Action Plan (8 Cal. Code Regs., § 3220); - Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411).	Subsection 5.17.2.3.2 Subsection 5.17.2.3.2	No Yes	See DR WS-5 to DR WS-6, and DR WS-8 to DR WS-9
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 5.17.3 Table 5.17-5	No	See DR WS-1 to DR WS-2
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 5.17.4 & 5.17.5 Table 5.17-6 & Table 5.17-7 Table 5.5-6	No	See DR WS-3
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within	Subsection 5.17.4 Table 5.17-6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: November 2025

Technical Area: **Worker Safety**

Project: Viracocha Hill BESS

Technical Staff: Michele Shi/Alvin Greenberg

Project Manager: Eric Veerkamp

Docket: 25-OPT-01

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Table 5.16-3 Table 5.5-6		
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 5.17.5 Table 5.17-7	Yes	

Attachment B

Data Requests

ATTACHMENT B

CEC DATA REQUESTS

AIR QUALITY

Section 5.1, Air Quality, page 5.1-1 states that the project would include an emergency diesel generator and a diesel fire pump. However, the application does not include the manufacturer's specification sheets for either the emergency diesel generator or the diesel-powered fire pump.

Additionally, note "b" shown below Table 5.1-5 (p. 5.1-12 of Section 5.1) and note "a" shown below Table 5.1-7 (p. 5.1-13) state that the fire pump proposed for the project would meet Tier 3 engine emission standards. This conflicts with the fire pump description given on page 5.1-12 of Section 5.1 and note "c" shown below Table 5.1-6 (p. 5.1-12 of Section 5.1), which state that the proposed fire pump would meet Tier 4 engine emission standards. Staff needs clarification on which engine emission standard the fire pump would be expected to meet.

DR AQ-1. Please provide the manufacturer's specification sheets for the emergency diesel generator and the diesel fire pump. The specification sheets must show engine power (in brake horsepower), emission rates, exhaust parameters, and the engine emission tier for the emergency diesel generator and the diesel-powered fire pump.

Section 5.1, Air Quality, Subsection 5.1.8, page 5.1-19 states that the project would include an emergency diesel generator and a diesel-powered fire pump. However, the application does not clarify whether there would be a selective catalytic reduction (SCR) system with ammonia to control the nitrogen oxides (NOx) emissions of the diesel engines.

DR AQ-2. Please clarify whether an SCR system would be used to decrease the NOx emissions of the emergency diesel generator and diesel-powered fire pump. If yes, please provide the project's estimated ammonia emissions in pounds per day and tons per year.

DR AQ-3. Please describe the handling of ammonia on site, specifically whether the ammonia would be stored on site and if so, please describe the storage container and the proposed location

within the project site. If the ammonia is planned to be delivered to the project site, please provide the number of truck trips and the frequency of such deliveries.

Section 5.1, Air Quality, Subsection 5.1.9, page 5.1-19 states that because project construction emissions would be temporary and would occur in open spaces with sparse worker and residential receptors, project construction emissions can be qualitatively assumed to have less than significant impacts on air quality.

Staff requires air dispersion modeling to quantify the pollutant concentrations and comprehensively evaluate project construction impacts against criterion "c" of the CEQA environmental checklist. This would include comparing modeled concentrations against state and federal impact thresholds.

DR AQ-4. Please provide an ambient air quality impacts analysis of all criteria pollutant concentrations including nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM₁₀), and particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), using a dispersion model such as AERMOD, during construction and compare these concentrations with the thresholds for state and federal AAQS or provide justification for why such modeling is not needed.

In Section 2, Project Description, Subsection 2.5, pages 2-33 to 2-34, the applicant provides a list of 21 reasonably foreseeable future projects within a six-mile radius of the project. Section 5.1, Air Quality, Subsection 5.1.7, page 5.1-18 states that the applicant will submit a cumulative impact analysis of these nearby future projects if required by the BAAQMD or the CEC.

To compare against the thresholds of significance for cumulative impacts contained in BAAQMD's 2022 CEQA Guidelines (Table 3-1, page 3-4), staff requires a quantification of the cumulative impacts of the project in combination with nearby future projects to determine if the project would have a significant impact under criterion "b" of the CEQA Environmental Checklist.

DR AQ-5. Please submit a modeling protocol for assessing the cumulative air quality impacts of the project during its standard operational phase in combination with other stationary emissions

sources within a six-mile radius that have received construction permits but are not yet operational or are in the permitting process or provide justification for why such an analysis is not needed.

ALTERNATIVES

Per Cal. Code Regs., tit. 20, Div. 2, Ch. 5, Appendix B (f) (1), an application must include a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site. Per CEQA Guidelines Section 15126.6 (a), "...the EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

The Viracocha Hill BESS Project application provides information on three site alternatives in Section 6.0 (TN 261781). However, the descriptions provided for each of the site alternatives are limited to the site's acreage, elevation, and the presence/absence of waters of the U.S. The alternative site descriptions do not describe the alternative gen-tie line routes that would be required for each site, nor do they provide further detail on the major characteristics of each site (e.g., engineering considerations, geologic hazards, sensitive biological or cultural resources, zoning, etc.). Per CEQA Guidelines section 15126.6 (d), an EIR must include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project," which could be summarized in "[a] matrix displaying the major characteristics and significant environmental effects of each alternative." Staff require further information on the major characteristics and the likely environmental effects of each alternative site in order to prepare an evaluation of alternatives consistent with CEQA Guidelines section 15126.6 (d).

DR ALT-1. Please supplement the alternatives analysis in Section 6.0 with the following information:

- a. Provide a map (preferably with a KMZ file provided) and description (i.e., length and width) of alternative gen-tie routes required to connect each alternative site to the Ralph Substation.
- b. Provide further detail on the major characteristics of each alternative site (e.g., engineering considerations, geologic

hazards, sensitive biological or cultural resources, zoning, etc.).

- c. Provide an alternatives comparison matrix that describes the environmental merits and likely impacts of each alternative site.

For examples on the level of detail required by staff, refer to the following docket filings from other Opt-In Applications:

- 24-OPT-05 (Corby BESS Project): TN 259874, Section 5 (Alternatives)
- 25-OPT-02 (Prairie Song Reliability Project): TN 266610, Attachment 5 (Section 4 Alternatives)

BIOLOGICAL RESOURCES

Per California Code of Regulations, title 20, section 1877 (a), Contents of an Opt-in Application for applicants seeking incidental take authorization, requires the Application include information required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10). In addition, California Code of Regulations, title 20, Appendix B (g)(13)(E) requires a discussion of all impacts (direct, indirect, and cumulative) to biological resources from the project. The species for which incidental take authorization is requested include federally and state threatened California tiger salamander (CTS)–Central California Distinct Population Segment (DPS) (*Ambystoma californiense*), state threatened and CDFW species of special concern tricolored blackbird (*Agelaius tricolor*), state candidate endangered and CDFW species of special concern western burrowing owl (*Athene cunicularia hypugaea*), state threatened Swainson’s hawk (*Buteo swainsonii*), and federal endangered and state threatened San Joaquin kit fox (*Vulpes macrotis mutica*).

Fully Protected Species: Section 3.3 of the ITP Application, subsection 3.3.2, Listed Species Presence Determination states that based on the literature review, eight state-listed wildlife species were evaluated for potential to occur in the Biological Study Area, including the five species above for which take coverage has been requested. The applicant assessed that Alameda whipsnake and California condor were absent from the area and Crotch’s bumble bee has a low potential to occur. Although a pair of bald eagles were recently observed within the Biological Study Area, foraging and nesting habitat is absent and take of this species is not anticipated. However, Section 3.4.1.9 of the Comprehensive Biological Survey Report (CBSR) states that based on nearby occurrences, the presence of suitable nesting

habitat near the Biological Study Area, and suitable foraging habitat within the Biological Study Area, the white tailed-kite has a moderate potential to occur in the Biological Study Area. Section 3.4.4.2 of the CCSR states that golden eagle is considered to be present foraging within the BSA and has a high chance of nesting within a potential disturbance buffer of planned construction activities. Appendix B of the CCSR shows white tailed kite having a high potential to occur and golden eagle to be present within the Biological Study Area.

The CEC cannot authorize take of fully protected species under an ITP unless the project meets the conditions and requirements set forth in Fish and Game Code section 2081.15. If take coverage is requested, CEC staff requests additional information to explain whether and how the project may qualify for issuance of a fully protected species ITP, including information about the nature of the project and its impacts as necessary to assess compliance with the requirements of Fish and Game Code section 2081.15.

DR BIO-1. Please provide additional information in the ITP application to evaluate the potential for golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*), both designated as fully protected species (Fish and Game Code section 3511), to occur in the Biological Study Area, and whether the project could potentially result in take of either or both species. Please submit a clean and redline and strikethrough version of the revised ITP application.

DR BIO-2. If the project is requesting take of fully protected species, please provide an analysis of whether the project qualifies for take under Fish and Game Code section 2081.15.

Temporary and Permanent Impacts. California Code of Regulations, title 20, Appendix B (g)(1) requires a discussion of expected direct, indirect, and cumulative impacts. CEC staff considers an impact to be temporary for California tiger salamander (CTS) when the following criteria are met: (1) recontouring and seeding of each temporary impact area occur by October 31 of the year of the impact, and no additional ground disturbing activities occur; (2) in regards to CTS, if the impact area is within 1,000 feet of an aquatic feature, all work is completed within this area, and exclusion fencing is removed, by October 31 of the same calendar year, allowing CTS unrestricted access between upland and aquatic habitat; and (3) temporary impact

sites have achieved vegetation success as described in a vegetation restoration plan.

If the temporary impact criteria cannot be met due to impacts occurring during the wet season or restoration activities not occurring the same year, then these areas are considered semi-permanent or permanent depending on the timing of restoration and achievement of performance standards.

Section 4.1 of the ITP Application states, "For purposes of this application, *temporary impacts are those that will be restored to pre-Project conditions*". Examples of temporary impacts include vegetation removal for parking, laydown, and storage areas as well as tensioning sites for conductor installation; these areas would be stabilized with hydroseed. The ITP Application describes permanent impacts as those that would result from vegetation removal for the construction of permanent structures and roadways and would not be restored during the lifetime of the project. The applicant acknowledges that permit conditions would likely require that recontouring and reseeding of temporary impacts occur within the year of impact.

Table 4-1 in Section 4.2 of the ITP Application lists 1.82 acres of permanent impacts to developed land. The jeopardy analysis for CTS in Section 4.2.1.2, states, "*Temporary impacts on upland habitats will be restored to their baseline condition within one year, and upland habitat temporarily or permanently affected by the Project will be mitigated*". Section 2.8 of the ITP Application, Construction Disturbance Area, notes that some temporary disturbance beyond the 0.70 acres would occur within the permanent disturbance area. However, Table 2-1 (p. 2-14), depicts 0.70 acres of temporary impacts related only to the gen-tie. All other project impacts, totaling 24.02 acres, are permanent.

In Section 2.9 of the ITP Application, the second sentence in the second paragraph states, "*Restored temporary disturbance areas will also include laydown areas and the shoulders of the access road. Disturbed road sections will be restored to their original contours*". The last paragraph on page 2-15 states, "*Disturbance areas associated with features classified as permanent (for example, reclaimed road shoulders) will be subjected to the postconstruction restoration monitoring. If monitoring indicates that these areas meet the criteria of temporary disturbance as defined by applicable permits such as the*

ITP, the associated acreage will be counted as a temporary rather than permanent impact."

The ITP application has conflicting information on what aspects of the project are temporary versus permanent impacts, and the acres of those impacts. Areas defined as permanent and temporary impacts are inconsistent between the sections, or included in one section and not another.

DR BIO-3. Please verify that temporary impacts for CTS meet the criteria defined, or provided an update to the acres for temporary, semi-permanent, and permanent impacts to CTS. Please provide clarification on the temporary and permanent project impacts, consistent with the following criteria: (1) recontouring and seeding of each temporary impact area occur by October 31 of the year of the impact, and no additional ground disturbing activities occur; (2) in regards to CTS, if the impact area is within 1,000 feet of an aquatic feature, all work is completed within this area, and exclusion fencing is removed, by October 31 of the same calendar year, allowing CTS unrestricted access between upland and aquatic habitat; and (3) temporary impact sites have achieved vegetation success as described in a vegetation restoration plan. Please ensure the description of temporary and permanent impacts is consistent with the tables showing the acres of impacts, any associated figures, and GIS data. The temporary and permanent impacts should be broken down by each aspect of the project and acreage associated with each type of impact. Please submit a clean and redline and strikethrough version of the revised ITP application.

Impact Acreage. The acreage of permanent impacts is inconsistent between the Project Application, ITP Application, and Figures. Section 5.2.2.2 (pp. 5.2-35), the description of potential permanent impacts listed add up to a total of 24.45 acres. Table 5.2-6, Temporary and Permanent Impacts (pp. 5.2-36), lists a total of 24.02 acres of permanent impacts. Impacts to non-native annual grasslands are listed as 22.20 acres and impacts to developed areas are 1.82 acres. Under Critical Habitat section (pp. 5.2-37), the Application states that the entire Biological Study Area overlaps critical habitat for California red-legged frog. However, permanent impacts to critical habitat total 22.2 acres, which is inconsistent from both the permanent acres of impacts provided previously.

Table 4-1 of the ITP Application shows a total of 24.02 acres of permanent impacts. Impacts to non-native annual grasslands are 22.20 acres and impacts to developed areas is 1.82 acres. Confidential Figure 3 ("Project Impacts") in the ITP Application depicts 22.20 acres of permanent impacts to nonnative annual grassland and 0.75 acres of permanent impacts to developed land. The figure does not depict areas of the project where temporary disturbances would receive restoration.

DR BIO-4. Please provide clarification on the acreages of the project's expected temporary and permanent impacts. Please rectify the acreage inconsistency between the project description in the Application and Tables, ITP Application, and Confidential Figure 3. Please include updated tables and GIS files, as needed, that include the accurate amount of temporary and permanent impacts. Temporary and permanent impact acres should be broken down by each aspect of the Project. Please submit a clean and redline and strikethrough version of the revised ITP application.

DR BIO-5. Please indicate in Figure 3 where temporary and permanent disturbances will occur and where restoration in temporary disturbance areas will occur. Please submit a clean and redline and strikethrough version of the revised ITP application.

Potential California tiger salamander breeding ponds. The ITP Application contains conflicting information regarding proximity of potential California tiger salamander (CTS) breeding ponds. The ITP Application and Biological Survey Report seem to describe only one potential breeding pond but describe it at varying distances to the project footprint. CEC staff, in coordination with CDFW, has determined there are at least three potential ponds present within 0.40 mile of the main BESS facility and that as many as eight potential breeding ponds could be present.

The CBSR, Appendix B, page B-4, California tiger salamander, states, "*There are 218 CNDDDB occurrences within 10 miles of the [Biological Study Area] BSA, with the closest occurrence located approximately 0.12 mile west of the BSA (CDFW 2025).*" Section 3.3.2.1 of the ITP Application, California tiger salamander, on page 3-5, states, "*The closest CNDDDB occurrence is approximately 0.18 mile west of the BSA and describes three larvae observed in stock ponds in 2015 as well as eggs, over 25 larvae, and dispersal of more than 50 subadults in*

2017." ITP Application Section 4.2.1.2, 4th paragraph of the Jeopardy Analysis states, "*The BESS facility, the main component of the Project, is located approximately 0.4 mile from the nearest stock pond. It is therefore reasonable to expect that very few individuals will move into the disturbance footprint and be impacted by the Project.*" The distance to the nearest CTS breeding pond is conflicting between the CBSR and ITP Application, as well as conflicting within the ITP Application.

DR BIO-6. Please provide additional information or clarification on the nearest CNDDDB occurrences of CTS, the nearest stock pond that could be used as breeding habitat for CTS, and the potential for individuals to move into the disturbance footprint and be impacted by the project. Please submit a clean and redline and strikethrough version of the revised ITP application.

DR BIO-7. Please provide a map of the project footprint including all potential or known CTS breeding ponds within dispersal distance of the Project footprint. Please submit a clean and redline and strikethrough version of the revised ITP application.

Storage of Pipes for CTS. California Code of Regulations, title 20, Appendix B (g)(13)(F) requires all measures to avoid and/or reduce adverse impacts to biological resources. Section 5.1.1.4 of the ITP Application under the General Design and Conservation Measures, bullet #15 would require inspection of all pipes over 4 inches in diameter. However, CTS can enter a pipe with a diameter of less than 4-inches.

DR BIO-8. Please update the minimization measure to include that pipes less than 4 inches in diameter would be capped or placed above ground, such as on a pallet, to avoid creating an attractive nuisance for CTS. Please submit a clean and redline and strikethrough version of the revised ITP application.

State-listed Plants. California Code of Regulations, title 20, Appendix B (g)(13)(F) requires a discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level of impacts to biological resources. Section 5.2, subsection 5.2.1 of the ITP Application under Measures Specific to State-listed Plants (p. 5-4) states, "*The Designated Biologist will make recommendations to the Applicant to avoid or minimize impacts on state-listed plant species based on completed preconstruction*

surveys". Minimization measures are only applicable if the project is requesting take coverage for those state-listed plants otherwise full avoidance would be required to avoid impacts.

DR BIO-9. Please revise the ITP application to clearly state that impacts to state-listed plants would be avoided unless the applicant requests take authorization for any plants listed under CESA or designated as Rare under the Native Plant Protection Act. Please submit a clean and redline and strikethrough version of the revised ITP application.

Western Burrowing Owl Preconstruction Surveys. California Code of Regulations, title 20, Appendix B (g)(13)(F) requires a discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level of impacts to biological resources. Section 5.5.1 of the ITP Application includes a measure for conducting two pre-construction "take avoidance surveys" for burrowing owl no more than 14 days before and within 48 hours of starting ground-disturbing activities. However, two pre-construction surveys may not confirm presence or absence and may not provide sufficient information on type of burrowing owl occupancy, such as nesting status or use of overwintering habitat within the project area. CEC staff, in coordination with CDFW, recommend the applicant conduct additional protocol surveys at the project site and not wait until two weeks before construction is due to commence before conducting surveys. Please see example below of an appropriate measure for conducting protocol-level surveys for burrowing owl:

Prior to starting construction-related Covered Activities, the Designated Biologist shall complete protocol-level overwintering and nesting surveys following the methodology described in the Staff Report on Burrowing Owl Mitigation, Appendix D (2012), found at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>. Surveys shall include a minimum of four visits and shall consist of walking line transects spaced 23 feet to 66 feet (7 to 20 meters) apart, or as close to this method as the terrain allows. Other transect spacing may be allowed as approved by the CEC. The four survey visits shall include at least one survey between February 15 and April 15, and a minimum of three surveys at least three weeks apart between April 15 and July 15 with at least one survey after June 15. If construction is scheduled to commence after April 15, 2026, the Designated Biologist shall conduct a sufficient number of both nesting season and overwintering surveys in 2025 and 2026 to gain an understanding of

owl use within the Project Area based on the date of the start of construction in consultation with the CEC Representative. The Designated Biologist shall submit the results of the survey to the CEC at least 15 days prior to beginning construction-related Covered Activities or other timeframe approved by the CEC, or within 24 hours prior to beginning construction-related Covered Activities if surveys overlap with the pre-construction avoidance surveys.

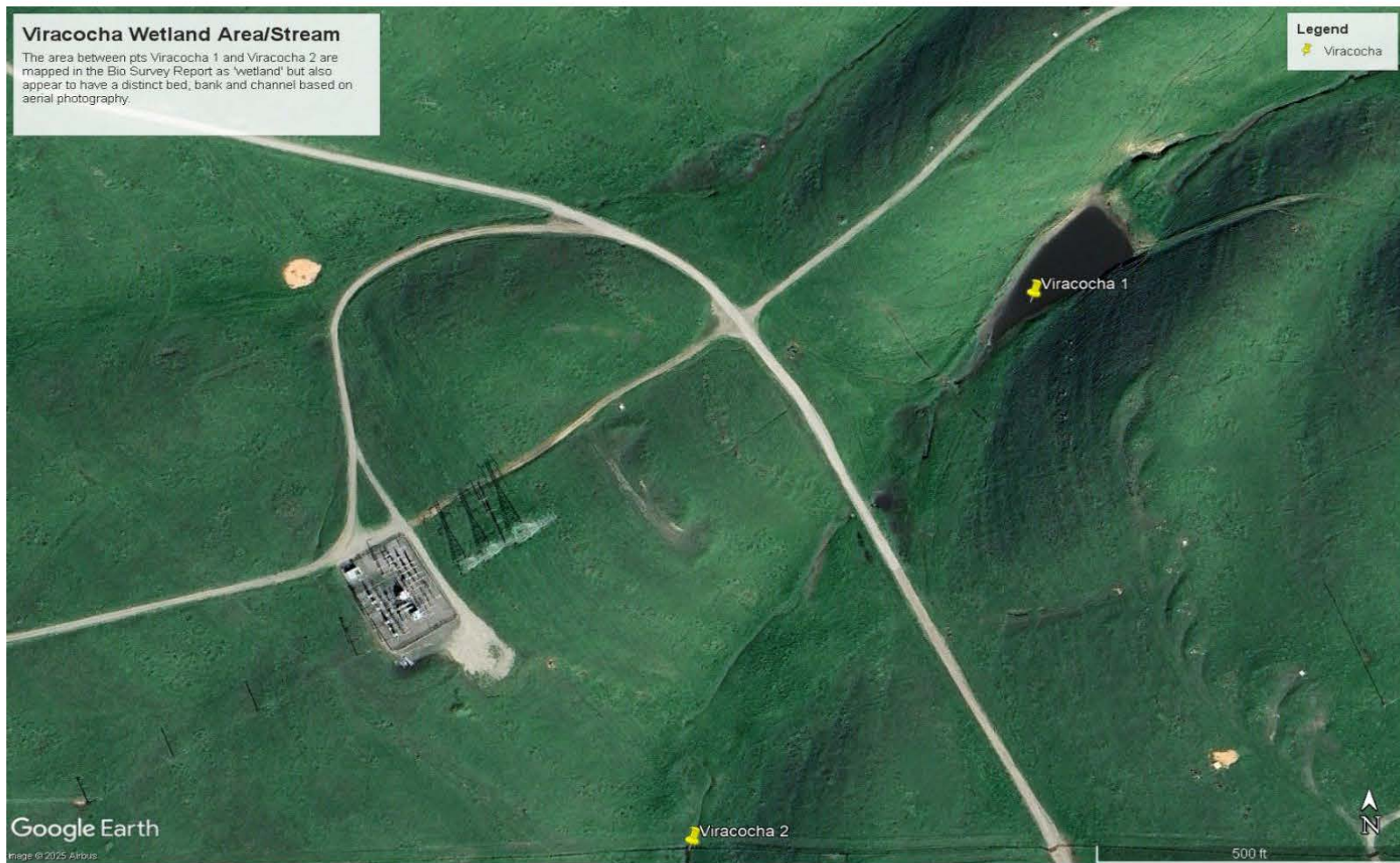
DR BIO-10. Please include an avoidance and minimization measure in the ITP application that states that a qualified biologist would conduct protocol-level surveys for western burrowing owl prior to construction. Please submit a clean and redline and strikethrough version of the revised ITP application.

Compensatory Mitigation for CTS. California Code of Regulations, title 20, Appendix B (g)(13)(F) requires all measures to avoid and/or reduce adverse impacts to biological resources; and Appendix B (g)(13)(F)(ii) requires all off-site habitat mitigation. Section 5.8.2 of the ITP Application under Compensatory Mitigation for CTS describes providing compensatory mitigation of 67.3 acres of non-native annual grassland habitat. Compensatory mitigation lands should meet the minimum habitat requirements for CTS including, but not limited to, one or more aquatic features on-site which have been documented to support successful CTS breeding in an average or below average rainfall year (abundance and distribution) or adjacent to aquatic features which have been documented to support successful CTS breeding in an average or below average rainfall year (abundance and distribution) and already conserved and managed for CTS; and no less than 100 acres of suitable upland or adjacent to suitable upland already conserved and managed for CTS.

DR BIO-11. Please update the ITP Application to provide a more detailed description of proposed compensatory mitigation for CTS to fully offset impacts of the project on this species and its habitat. Please submit a clean and redline and strikethrough version of the revised ITP application.

Aquatic Resources Delineation. California Code of Regulations for Opt-in Projects, title 20, section 1877 (a), for Applicants seeking a lake and streambed alteration authorization under Fish and Game Code section 1602, requires the application include information required in California Fish and Game Code section 1602(a)(1)(A)-(F). Sections 3.5

to 3.8 of the CBSR discusses the aquatic resources delineation, but does not include ephemeral streams as an example of an aquatic feature. Based on CEC staff's review of aerial photography – in coordination with CDFW –, features within the project site, particularly in the southeast area mapped as a wetland in Figure 3-3 of the Biological Resources Survey Report, may function as ephemeral streams (see photo below). If ephemeral streams are present, activities within or near them may be subject to notification requirements under California Fish and Game Code, section 1602.



Pursuant to Fish and Game Code, section 1602, an entity must notify CDFW (and obtain a Lake or Streambed Alteration [LSA] agreement, if one is required under section 1602) before conducting any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change the bed, channel, or bank of any river, stream, or lake;
- Substantially use material from the bed, bank, or channel of any river, stream, or lake; or
- Deposit or dispose of specified materials (including debris or waste) where they may pass into any river, stream, or lake.

Under LSA regulations, a "project" for purposes of Fish and Game Code, section 1600 et seq. is any single activity that is subject to the section 1602 notification requirement, or a group of such activities that are interrelated and could or will impact similar fish and wildlife resources. (Cal. Code Regs., tit. 14, §§ 699.5(a)(1) and (a)(11)). Under the CEC's opt-in permitting authority, the CEC assumes responsibility for implementing and ensuring compliance with the requirements of Fish and Game Code, section 1602 for projects under its jurisdiction.

DR BIO-12. Please provide a more detailed assessment of aquatic features within the project area that could be impacted by project activities. Please provide details regarding WET-3 and WET-4 to determine whether they qualify as ephemeral channels subject to 1602 notification requirements. Please submit a clean and redline and strikethrough version of the revised information that would be included in an LSAA notification.

Nitrogen Deposition. California Code of Regulations, title 20, Appendix B (g)(13)(B)(ii) requires an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. Section 5.2.2.3 of the Application, states that the project would result in emissions of nitrogenous compounds such as nitrogen oxide gases (NO and NO₂ or NO_x) from the proposed diesel-fueled emergency generator and fire pump. However, a formal nitrogen deposition modelling analysis was not conducted due to the minimal expected amount of NO_x released from project operations. Instead, a criteria pollutant modeling analysis

was performed for NO_x, using NO_x modeling impacts as a surrogate for nitrogen deposition. California Code of Regulation, title 20, section 1877(d), Appendix B (g) (13) (B) (ii) requires nitrogen deposition modeling to determine deposition rates and location. If surrounding areas already meet critical loads for nitrogen deposition, any additional nitrogen deposition may result in an impact. Staff considers protected areas and designated critical habitat within a six-mile radius in the analysis of nitrogen deposition impacts from the project. The entire project site is designated as critical habitat for California red-legged frog.

DR BIO-13. Please provide the following:

- a. Nitrogen deposition modeling results of projected nitrogen deposition rates from operation of the proposed diesel-fueled emergency generator and fire pump. Include the complete citation for references used in determining deposition rates and locations, per Appendix B(g)(13)(C)(ii).
- b. Aerial map of the isopleth graphic depicting modeled nitrogen deposition rates per Appendix B (g)(13)(B)(ii). The geographical extent of the nitrogen deposition map(s) should include the entire plume from the source and a radius of 6 miles from the project site, specifically identifying acres of sensitive habitat(s) within each isopleth. Please provide monitoring parameters, files, and GIS shapefiles.
- c. Amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition.
- d. Description of habitat and species potentially affected.
- e. Provide an impact discussion, specifically addressing impacts to sensitive species habitat, per Appendix B(g)(13)(E).

CNDDDB Field Survey Forms. California Code of Regulation, title 20, section 1877(d), Appendix B (g)(13)(D) requires copies of the California Natural Diversity Database (CNDDDB) records and field survey forms completed by the applicant's biologist(s).

DR BIO-14. Please provide copies of the California Natural Diversity Database (CNDDDB) records and field survey forms for any

special-status species observed within the Biological Study Area or a 1 mile buffer.

Tricolored Blackbird Nesting Habitat. California Code of Regulation, title 20, section 1877(d), Appendix B (g)(13)(D) requires a description and results of all field studies and specialized surveys used to provide biological baseline information about the project; and Appendix B (g)(13)(D)(ii) which requires biological resource surveys conducted using appropriate field survey protocols. The tricolored blackbird habitat assessment in Section 3.4.1.7 of the CBSR states that tricolored blackbird is unlikely to nest within the Biological Study Area because the patches of suitable nesting substrate (blackberries or dense thistle) are relatively small in extent. Nesting colonies may consist of as few as 50 pairs (Grinnell and Miller 1944). Nest density within colonies varies by substrate and location but has been observed at approximately 6 nests per m² in Himalayan blackberry (Airola et al. 2024). In a patch at this density, an area of nesting habitat as small as 8.34 m² could support a small colony.

DR BIO-15. Please provide clarification on the approximate size of the patches of suitable nesting substrate for tri-colored blackbird within the Biological Study Area and within 1 mile of the Biological Study Area.

Floral Resources for Crotch's Bumble Bee and Monarch Butterfly. California Code of Regulation, title 20, section 1877(d), Appendix B (g)(13)(D) requires a description and results of all field studies and specialized surveys used to provide biological baseline information about the Project; and Appendix B (g)(13)(D)(ii) which requires biological resource surveys conducted using appropriate field survey protocols. Section 5.2.1.7 of the application states that a habitat assessment for Crotch's bumble bee is underway, and Section 5.2.1.9 states that floral resource composition and coverage assessments to inform foraging habitat suitability for Crotch's bumble bee were being documented concurrently with botanical surveys. The habitat assessments in the CBSR for Crotch's bumble bee (Section 3.4.1.13) and monarch butterfly (3.4.1.14), and the ITP Application for Crotch's bumble bee (Section 3.3.2.2), state that floral resources are limited, but it is not clear how this determination was made. The HCP Outline states that the USFWS recommended a habitat assessment, supported by pollinator plant/host plant surveys, to determine if coverage for monarch is needed.

DR BIO-16. Please provide additional information on metrics used to determine the extent of floral resources (e.g. the acreage of coverage by flowering plants, the suitability of flowering plant species present, gaps in seasonal availability of flowers, timing of habitat assessments, etc.). Please submit a clean and redline and strikethrough version of the revised Comprehensive Biological Survey Report.

Protocol Surveys for Western Burrowing Owl. California Code of Regulation, title 20, section 1877(d), Appendix B (g)(13)(D) requires a description and results of all field studies and specialized surveys used to provide biological baseline information about the Project; and Appendix B (g)(13)(D)(ii) which requires biological resource surveys conducted using appropriate field survey protocols. Table 2-1 of the CBSR, Biological Survey and Aquatic Resource Delineation Field Work Completed to Date, lists the dates of burrowing owl surveys. Non-breeding season surveys were conducted in December; and breeding season surveys were conducted in April, May, and twice in June. According to the CDFW 2012 BUOW Staff Report, non-breeding surveys are to be conducted following the same methods as breeding season surveys except at least four (4) visits should be conducted, spread evenly, throughout the non-breeding season. Table 2-1 shows only one non-breeding season survey was conducted.

The 2012 Staff Report also advises that poor weather may affect the surveyor's ability to detect burrowing owls, therefore, surveys on days when wind speed is >20 km/hr, and when precipitation or dense fog is present should be avoided. In the 2nd paragraph of subsection 2.3.5, pg. 2-8, the CBSR states weather conditions during "both surveys" (assuming this referred to the non-breeding and breeding season surveys) were suitable for observing burrowing owl. However, the last sentence of the same paragraph states that transect spacing was reduced to 7 yards due to dense fog.

In addition, the 2012 Staff Report advises that surveys between morning civil twilight and 10:00 AM and two hours *before* sunset until evening civil twilight provide the highest detection probabilities. The Comprehensive Biological Survey Report, subsection 2.3.5, states that the surveys were conducted no sooner than 30 minutes after civil twilight.

DR BIO-17. Please provide a correction in the Comprehensive Biological Survey Report that not all surveys were conducted according to the recommended protocols in the 2012 Staff Report. Please provide the details as to which aspects of the surveys were not conducted in accordance with recommended protocols, and how this may affect the detection results. Please submit a clean and redline and strikethrough version of the revised Comprehensive Biological Survey Report.

HCP Application. California Code of Regulations, title 20, Appendix B (g)(13)(E) requires a discussion of all impacts (direct, indirect, and cumulative) to biological resources from the Project; Appendix B (g)(F)(i) requires all measures to avoid and/or reduce adverse impacts to biological resources; Appendix B (g)(13)(F)(ii) requires all off-site habitat mitigation; and Appendix B (i) (3) requires that a schedule be provided for all permits outside the authority of the CEC;. Section 5.2.7 of the application stated the project is expected to require a Habitat Conservation Plan I compliance with the ESA Section 10 consultation process. The HCP Summary Outline states the species the project expects to initiate consultation for, but that the habitat assessment, HCP, and application have not yet commenced. The species that are expected to be covered are San Joaquin kit fox, northwestern pond turtle, California red-legged frog, California tiger salamander, and western spadefoot. Pollinator plant surveys and habitat assessments will help further determine if coverage for monarch butterfly is needed.

DR BIO-18. Please provide a schedule indicating when the habitat assessment, HCP, and application for compliance with the Federal Endangered Species Act consultation process will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

DR BIO-19. Please provide species-specific mitigation measures and any compensatory mitigation, as needed, for the species and critical habitat expected to be covered under the Section 10 HCP.

Cumulative Impacts. California Code of Regulations, title 20, Appendix B (g)(13)(E) requires a discussion of all impacts (direct, indirect, and cumulative) to biological resources from the Project. Section 2.5, Cumulative Impacts, of the application, and Figure 2-6 provide the names and location of Projects within a 6-mile buffer around the project site. Section 5.2.3, [Biological] Cumulative Impacts,

of the application and the Section 4.4, Cumulative Effects, of the ITP Application, only mentions the Los Vaqueros Reservoir Project and Vasco Road Widening Project. These two projects are not listed in Table 2-9, Cumulative Projects. In the jeopardy analysis for various species, the ITP application consistently mentions how the Project overlaps the footprint of the San Hill and is located approximately 2 miles northeast of the Rooney Ranch Wind Repowering Project.

DR BIO-20. Please provide a more thorough analysis of the cumulative effects of projects within 6 miles, as listed in Table 2-9 and shown in Figure 2-6, that may have a cumulative impact on biological resources, or discuss why the cumulative impact will be less than significant. Please provide more information on the Los Vaqueros Reservoir Project and Vasco Road Widening Project and their relevance on cumulative impacts. Please submit a clean and redline and strikethrough version of the revised ITP application. Please submit a revised Cumulative Impacts section with additional requested details.

Agency Correspondence. California Code of Regulation, title 20, section 1877(d), Appendix B (g)(13)(H) requires copies of any preliminary correspondence between the Project applicant and state and federal resource agencies. The HCP Outline mentions that USFWS has provided recommendations for the Section 10 framework. Application Section 5.2.6 provides the agency contact information, but does not provide copies of correspondence relating to those contacts.

DR BIO-21. Please provide copies of any correspondence between the project applicant and any state and federal resource agencies.

Wildlife Nursery Sites. California Code of Regulation, title 20, Appendix B (g)(13)(B) requires information on wildlife nursery sites. Section 5.2.1.1 of the application discussed wildlife movement corridors but did not discuss nursery sites. Nursery sites could include, but are not limited to, rookery, spawning, nesting, aquatic habitats, roosting, or denning sites.

DR BIO-22. Please describe potential or known wildlife nursery sites within the Biological Study Area and within 1 mile of the Biological Study Area.

Species and Habitat Mapping. California Code of Regulation, title 20, Appendix B (g)(13)(B) requires a list of species and habitat(s)

observed and those with potential to occur within 1 mile of the Project site, including detailed maps as required under Appendix B (g)(13)(B)(i). Figure 2 in ITP Confidential shows state-listed species observations within the Biological Study Area and the larger BESS parcel. However, the BESS parcel does not include areas west, southwest, or south of the project. In addition, only state-listed species observations are included. Section 5.2.1.10 of the Application, under Incidental Observations, states that 13 special-status wildlife species were observed. In addition, the Application states that biologists incidentally observed California red-legged frog breeding in a stock pond approximately 0.75 mile south of the BSA as well as inhabiting a stock pond approximately 0.2 mile west of the BSA (Section 3.4.1.1); California tiger salamander breeding in a stock pond approximately 0.75 mile south of the BSA (Section 3.4.1.2); five adult turtles in a stock pond approximately 0.63 miles east of the BSA (Section 3.4.1.4); approximately 200 tricolored blackbirds foraging in the southern portion of the BSA (Section 3.4.1.7); an adult American badger at a den northeast of the BSA (Section 3.4.1.10).

DR BIO-22. Please provide detailed map(s) that show all special-status species observations beyond the BESS parcel and within 1 mile of the BSA. Please include the locations of all state, federal, or other special-status species that are listed in Table 5.2-2 Special-Status Plants with Moderate or High Potential to Occur within the Biological Study Area, Table 5.2-3, Special-Status Wildlife with Potential to Occur in the Biological Study Area, and listed as one of the 13 special-status wildlife species observed.

BESS Related Fires. California Code of Regulations, title 20, Appendix B (g)(1) requires a discussion of expected direct, indirect, and cumulative impacts. A BESS related fire could result in direct and indirect impacts to special-status species and their habitat. BESS fires can result in a release of toxic gases, heavy metals, and persistent organic compounds, which may pose acute and chronic risks to nearby ecological receptors. Recent studies have documented that thermal runaway and subsequent fires at BESS have the potential to release toxic gases and other potentially harmful chemicals that result in localized air and soil contamination. These chemicals have the potential to result in adverse effects on vegetation, pollinators, amphibians, and aquatic organisms, particularly in sensitive habitats such as aquatic habitats, riparian corridors, and designated critical habitat areas. While some studies have suggested these incidents have not

resulted in long-term contamination, the potential for acute exposure and habitat degradation warrants a site-specific analysis.

DR BIO-23. Please provide a detailed assessment of potential impacts to special-status species, habitats, aquatic resources, and critical habitats, in the event of a fire involving lithium-ion or other battery technologies occurs during the operation of the facility. Please evaluate the proximity of the facility to sensitive biological resources, describe potential exposure pathways, and identify mitigation measures or design features that would reduce the likelihood or severity of ecological impacts in the event of a fire. Include a discussion of direct, indirect, and cumulative impacts, the significance level of those impacts, and mitigation measures, as needed, to reduce those impacts.

REFERENCES CITED

Airola, D., E. C. Beedy, S. Sanders, and J. Medley. 2024. Tricolored blackbird survey methods. *California Fish and Wildlife Journal* 110:e6

Grinnell, J., and A. H. Miller. 1944. The distribution of the birds of California. *Pac. Coast Avifauna* No. 27. 608pp

CULTURAL AND TRIBAL CULTURAL RESOURCES

The California Code of Regulations, title 20, section 1704(a)(3)(C) requires a "list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference." Section 5.3, Cultural Resources, of the application provides this information mainly through numerous in-text citations and corresponding entries in a dedicated References subsection. The References subsection does not contain entries for all sources of information that are cited in Section 5.3. In addition, the References subsection contains bibliographic entries for sources that are not cited in the main body of Section 5.3, making it unclear whether Section 5.3 is missing source citations critical to the analysis.

DR CUL/TRI-1. Please provide the bibliographic information for the citation "Garcia and Associates 2009" (see Section 5.3, page 5.3-20).

DR CUL/TRI-2. Please indicate whether the following sources from the References subsection should be cited in the text of Section 5.3 and, if so, where.

- Cardenas 2016
- East Bay Hill People n.d.
- Fentress 2009
- Historic Marker Database 2025
- Jacobs 2018
- OHP 1990
- Ortiz 1997
- USACE 2018
- USDA-NRCS 2024

Figure CULTURAL-5 in Confidential Appendix 5.3A, Cultural Resources Technical Report, provides a label for previously recorded cultural resource P-01-002103, but does not indicate the resource's location.

DR CUL/TRI-3. Please revise Figure CULTURAL-5 to indicate the location of cultural resource P-01-002103 and resubmit to the project docket under request for confidential designation.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(2)(B), requires a "copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided." Figure CULTURAL-6 in Confidential Appendix 5.3A, Cultural Resources Technical Report, only maps and labels eight of 37 previous cultural resource studies (studies 121, 6007, 6125, 10724, 11826, 12137, 43685, and 57685).

DR CUL/TRI-4. Please revise Figure CULTURAL-6 to depict and label the remaining 29 previous cultural resource studies. Additional figures are acceptable if needed to maintain clarity. Submit the revised figure(s) to the project docket under request for confidential designation.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(2)(B), requires the applicant to identify "any cultural

resources or tribal cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum.” Although the applicant contacted eight historical societies and government agencies, it does not appear that the applicant consulted the Alameda County Register of Historic Resources.

DR CUL/TRI-5. Please contact the County of Alameda’s Planning Director to request access to or a search of the Alameda County Register of Historic Resources for the project area and describe the results of the search. Additional information about this register is available at:

https://www.acgov.org/cda/planning/generalplans/historic_preservation.htm.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(2)(C) requires a “technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is incorporated by reference in its entirety...” The confidential Cultural Resources Technical Report (Appendix 5.3A) submitted with the application is missing bibliographic entries for some of the sources cited in the text. In addition, the References section of Appendix 5.3A lists some sources that do not appear to be cited in the text.

DR CUL/TRI-6. So that the CEC staff may evaluate the basis for the findings and other information in Appendix 5.3A, please identify the following sources that are cited in the confidential report.

- Boland 2010
- Garcia and Associates 2009
- Lightfoot 2002
- Price 2022
- Ritter 2018

DR CUL/TRI-7. Please indicate whether the following sources from the References subsection should be cited in the text of Appendix 5.3A and, if so, where.

- Cardenas 2016
- City of Livermore 2021

- eLivermore 2003
- Fentress 2009
- Jacobs 2018
- Lightfoot and Luby 2002
- Ortiz 1997
- USACE 2018
- USDA-NRCS 2024

The assessment of potential impacts on cultural and tribal cultural resources relies, in part, on understanding the extent and nature of the ground-disturbing activities associated with a proposed project. The application provides some detail as to the depth of excavation anticipated for construction of the gen-tie transmission structure foundations. In addition, the Project Description section of Appendix 5.3A further details the depth of certain project features (stormwater management features) and provides a general characterization of estimated excavation depths across the project. However, it is not clear that the estimated excavation depths described incorporate all proposed construction elements of the project or if it is only describing the grading of the BESS equipment yard.

DR CUL/TRI-8. Please describe and characterize the scale of excavation (particularly depth) required for various project components, including:

- a. BESS foundations
- b. Medium voltage collection system
- c. Onsite electrical equipment
- d. Emergency electrical backup system
- e. Fire protection system
- f. Improvements to a 0.3-mile-long access road
- g. A 0.15-acre road improvement to the turning radius on the access road
- h. Expansion of the Ralph substation
- i. New switching station or line-tap, adjacent to the existing substation at the proposed alternate substation area

- j. Security fencing and systems
- k. Soil disturbance associated with constriction of gen-tie line, including preparation of ROW, structure sites, pads, and permanent ROW improvements

Section 2.2.1.4.1.6, Site Grading and Drainage, of the application indicates that excavated materials suitable for backfill will be stored in small stockpiles at designated locations. However, it is unclear whether the stockpiled materials will remain onsite.

DR CUL/TRI-9. Please clarify if the stockpiles materials will stay onsite or if they will be stockpiled offsite. If the latter, identify the offsite stockpile location.

REFERENCES CITED

- Cardenas 2016 – Gloriella Cardenas. *Cultural Resources Inventory Report for the Summit Wind Repower Project*. Prepared for Altamont Winds, LLC. CH2M HILL, Inc., 2016
- City of Livermore 2021 – General Plan Documents: 4. Community Character. Accessed online at: <https://www.livermoreca.gov/departments/community-development/planning/2003-2025-generalplan#!/>
- East Bay Hill People n.d. – East Bay Hill People. Brushy Peak – Livermore. Accessed online at: <https://eastbayhillpeople.com/brushy-peak-livermore-2/>
- eLivermore 2003 – eLivermore. Livermore Railroad History. Accessed online at: https://www.elivermore.com/photos/Hist_lvr_railroad5.htm
- Fentress 2009 – Jeffrey B. Fentress. *Archaeological Reconnaissance of the Brushy Peak Regional Preserve Trail System, Alameda County, California*.
- Historic Marker Database 2025 – Historic Marker Database. Accessed online at: <https://www.hmdb.org/m.asp?m=197612>
- Jacobs 2018 – Jacobs Engineering. *Cultural Resources Construction Monitoring Plan – Summit Wind Repowering Project*. Jacobs, Irvine, CA, 2016
- Lightfoot and Luby 2002 – K. G. Lightfoot and E. M. Luby. "Chapter 14: Late Holocene in the San Francisco Bay Area." In *Catalysts to Complexity: Late Holocene Societies of the California Coast*.

- Perspectives in California Archaeology. Vol. 6. Los Angeles: University of California, Cotsen Institute of Archaeology, 2002
- OHP 1990 – Office of Historic Preservation. *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*. Department of Parks and Recreation, Sacramento, CA, 1990
- Ortiz 1997 – Beverly Ortiz. Sacred Geography of the Los Vaqueros Project Area. In *Native American History Studies for the Los Vaqueros Project*, edited by D. A. Fredrickson, pp. 54–73. Anthropological Studies Center, Sonoma State University, 1997
- USACE 2018 – United States Army Corps of Engineers. Memorandum of Agreement between the U.S. Army Corps of Engineers, San Francisco District and the California State Historic Preservation Officer Regarding the Summit Wind Repowering Project, U.S. Army Corps of Engineers Regulatory Permit No. 2014-00231S Alameda and Contra Costa Counties, California. On file at Jacobs, Irvine, CA
- USDA-NRCS 2024 – United States Department of Agriculture-National Resources Conservation Service. Soil Map. Accessed online at: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

EXECUTIVE SUMMARY

California Code of Regulations, title 20, §1704, (a) (4) requires each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation. Application Appendix 1B (TN 261769) includes a partial list of persons who prepared the application with “TBD” identified under the preparer column for multiple sections. Submittal Package #2, Volume 2 (TN 264231), indicates that Appendix 1B – List of Preparers has been updated but the updated materials appear to have been omitted.

DR ES-1. Please provide a complete list of preparers that identifies the person or persons responsible for each application chapter or section.

California Code of Regulations, title 20, division 2, chapter 5, appendix B requires a description of and maps depicting, the region, the vicinity, and the site and its immediate surroundings.

DR ES-2. Please include the 142-acre project study area (as shown on Figure 2-1) in Figure 1-1 Project Vicinity and Figure 1-4 Project Features.

GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)

To help meet hydrofluorocarbon (HFC) reduction goals, California adopted Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses. The current Cal. Code Regs., tit. 17, § 95375(c)(1) states that no person shall sell, lease, rent, install, use, or otherwise enter into commerce in the State of California any end-use equipment or product manufactured after the effective date that does not comply with Table 3 (which includes non-residential air conditioning equipment) of section 95374(c), with exceptions stated under section 95375(c)(2).

In Section 2.2.1.4 of the Opt-In Application (p. 2-12), the applicant states that the thermal system for the BESS system is “anticipated to be a self-contained closed-loop coolant (50-50 ethylene glycol-water) and refrigerant (typically R-134a) unit” and adds in Section 5.1.6.1 (p. 5.1-12) that the refrigerant leak estimate for the thermal system is still “[t]o be determined ([p]ending for data)”.

To ensure that the chosen BESS cooling system and refrigerant would comply with Cal. Code Regs., tit. 17, § 95375(c)(1), staff requires the following information.

DR GHG-1. Please provide a description of the cooling system design for the battery energy storage system and confirm or provide the identity of refrigerant(s) that the BESS cooling system will use.

DR GHG-2. Please provide an estimate of annual refrigerant leakage, reported as carbon dioxide equivalent (CO₂e) emissions, from the cooling system proposed for the project.

DR GHG-3. Please demonstrate how the use of any refrigerant(s) proposed for BESS cooling would comply with the HFC prohibitions. If not, please propose an alternative refrigerant, and provide updated annual refrigerant leakage estimates, reported as carbon dioxide equivalent (CO₂e) emissions, associated with the newly proposed refrigerant.

Staff needs to better understand the direct and indirect GHG emissions

associated with the battery energy storage system (BESS). Since battery performance degrades over time and gradually decreases round-trip efficiency, staff expects that battery augmentation would be performed to offset battery degradation and to maintain project performance commitments, leading to an increase in auxiliary loads. Staff needs to determine the total number of battery enclosures by the midpoint of the project's life cycle.

Staff will also need the annual indirect GHG emissions associated with energy losses due to transmission and charging/discharging cycle losses, as well as annual indirect GHG emissions due to auxiliary loads for both the beginning (year 1) and midpoint of the project life (year 15 assuming a 30-year project life, as stated in Section 5.1.6.2 of the Opt-In Application [TN 264232]). Additionally, if grid power is used to charge the BESS, staff needs to know the indirect GHG emissions associated with charging from the electrical grid and the carbon intensity value used to derive the indirect GHG emissions associated with grid charging.

Staff needs the spreadsheet file(s) of the emissions calculations with live, embedded calculations to complete the analysis.

DR GHG-4. Please estimate the annual indirect GHG emissions (metric tons of CO₂e) resulting from energy losses due to transmission and charging/discharging cycles. Please include assumptions that account for the degradation of round-trip efficiency over the project lifetime in the calculation of indirect GHG emissions.

DR GHG-5. Please estimate the annual indirect GHG emissions (metric tons of CO₂e) from auxiliary loads, such as BESS cooling. Please include assumptions that account for the BESS efficiency degradation over the project lifetime in the calculation of indirect GHG emissions.

DR GHG-6. If the BESS would be charged by the grid, please calculate the indirect GHG emissions associated with charging from the grid and displaced GHG emissions with discharging to the grid. Provide assumptions for the number of hours annually that the BESS could be charged by the grid, the GHG emission intensity factor from the electrical grid during charging and discharging considering carbon neutrality by 2045, and the efficiency degradation over the project lifetime in the calculation of indirect

GHG emissions.

DR GHG-7. Please provide a copy of the spreadsheet file(s) containing the emissions calculations performed for **DR GHG-4**, **DR GHG-5**, and **DR GHG-6** with live, embedded calculations.

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

DR GHG-8. What other technologies or fuel alternatives to diesel for the backup generators have you explored and why were they not pursued?

DR GHG-9. Has the project applicant explored the procurement of renewable diesel and/or carbon offsets as a means of demonstrating consistency with the State of California's goal of carbon neutrality? If not, why not?

According to the Regulation for Reducing Greenhouse Gas Emissions from Gas-Insulated Equipment (California Code of Regulations, title 17, sections 95350 through 95359.1) starting on the applicable phase-out dates, no person may acquire SF₆ gas-insulated equipment (GIE) for use in California unless certain provisions are met.

DR GHG-10. If the project is proposing to use SF₆, please describe how the project would comply with the phase-out provisions.

In Volume 1 of the Opt-In Application (TN 264232), best management practices (BMPs) for reducing fugitive dust emissions are included from Table 5-2 of the BAAQMD CEQA Guidelines. However, the BMPs addressing construction-related GHG emissions from Table 6-1 of the BAAQMD CEQA Guidelines are not.

DR GHG-11. Please include the BMPs for Construction-Related GHG Emissions from Chapter 6.

HAZARDOUS MATERIALS HANDLING

California Code of Regulations, title 20, Appendix B (g) (10) (A) requires a list of all materials used or stored on site, including discussion of toxicity of each material, which are hazardous or acutely hazardous as defined in California Code of Regulations, title 22, § 66261.20 et seq. Additionally, Appendix B (g) (10) (C) requires a discussion of the storage and handling system for each hazardous material used or stored at the site.

Section 5.5.1.2 of the Application discusses hazardous materials to be used during project construction, operations and decommissioning. Subsection 5.5.1.2.1 briefly discusses hazardous materials used during construction, including "small quantities of gasoline, diesel fuel, oils, lubricants, solvents, detergents, degreasers, paints, ethylene glycol (antifreeze), and welding materials and supplies." The application does not adequately discuss the quantities and storage of hazardous materials that will be used during the construction phase of the project.

DR HAZ-1. Provide a list of all hazardous materials to be used or stored on site during construction, including estimated quantities and storage information including location and storage container information.

California Code of Regulations, title 20, Appendix B (g) (10) (B) requires a map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials. The Application contains Figure 5.5-1 in Section 5.5, which depicts the location of schools, hospitals, daycare facilities, long-term health care facilities, within the area potentially affected by the release of hazardous material. However, the scale of Figure 5.5-1 is not 1:24,000 and the Application does not contain a figure depicting these items at a scale of 1:24,000.

Additionally, subsection 5.5.1.1 of the Application states that no hospitals or prisons are located within 6 miles of the project but does not specifically address long-term care facilities.

DR HAZ-2. Please adjust the scale of the Figure 5.5-1 to 1:24,000.

DR-HAZ-3. Please confirm that there are no long-term health-care

facilities within 6 miles of the project site that could potentially be affected by the release of hazardous materials.

Subsection 5.5.2.5.1 of the Application does not adequately discuss the fire and explosion risks associated with the project. Specifically, it does not directly discuss potential impacts of lithium battery fires during transportation of lithium batteries to the project site. The project would increase the potential for accidents involving lithium batteries being transported to the project site. Recent semi-truck accidents involving lithium batteries have resulted in the shutdown of I-80 near Nyack and I-15 near Baker.

DR HAZ-4. Please provide a discussion of actions that the project would implement to reduce the probability of lithium battery fires during transportation of batteries to and from the project site and actions to reduce the impact of such fires (if they occur) to motorists and nearby sensitive receptors.

LAND USE, AGRICULTURE, AND FORESTRY

In Section 5.6 "Land Use" of the application, Subsection 5.6.1.4 states that the project site is under a Williamson Act contract (p. 5.6-2). The application does not include a copy of the Williamson Act contract.

DR LAND-1. Please include a copy of the Williamson Act contract on the project parcel.

Subsection 5.6.1.3 states that the project site is classified as "Grazing Land" by the Farmland Mapping and Monitoring Program (FMMP) (p. 5.6-2). Subsection 5.6.1.5.4 states that the project and surrounding land were previously used for cattle grazing (p. 5.6-7).

DR LAND-2. Please discuss any prior FMMP classifications of the site before it was classified as "Grazing Land".

DR LAND-3. Please confirm the current grazing status of the property and provide the last year it was used for grazing.

The "Alameda County Uniform Rules and Procedures Governing Agricultural Preserves and Williamson Act Contracts" document includes required findings for determining if a project is a compatible use on a Williamson Act property. One such finding is that there is an existing commercial agricultural use on the parcel that meets one of the thresholds established in Uniform Rule 1.

DR LAND-4. Include information on whether there is an existing commercial agricultural use on the property that meets the definitions in Uniform Rule 1.

REFERENCE CITED

Alameda County 2011 – Alameda County Community Development Agency Planning Department. Alameda County Uniform Rules and Procedures Governing Agricultural Preserves and Williamson Act Contracts. Amended October 11, 2011. Accessed on October 28, 2025. Accessed online at:
https://www.acgov.org/cda/planning/generalplans/williamson_act.htm#:~:text=The%20California%20Land%20Conservation%20Act,preserving%20land%20for%20agricultural%20use.

NOISE AND VIBRATION

In Section 5.7, Figure 5.7-1 shows R-3 as the “Closest Residence” approximately 2 miles east of the project site, while Section 5.7.4 states the closest residence is approximately 1.2 miles north of the project site across Bethany Reservoir.

Section 5.7.2.2 estimates ambient noise using Annex C of ANSI S12.9-2013 (land-use table) and provides no long-term site measurements. California Code of Regulations, title 20, Appendix B (g) (4) (B) requires noise measurements for a minimum of 25 consecutive hours at a minimum of one site.

DR NOISE-1. Please identify and confirm the closest noise-sensitive receptor (residence) with clear distance and direction from the project site and provide an updated figure showing the confirmed closest noise-sensitive receptor.

DR NOISE-2. Please conduct a continuous 25-hour noise survey at the confirmed closest noise-sensitive receptor and provide hourly average ambient noise levels during the 25-hour period in A-weighted scale (dBA) L_{eq} , L_{10} , and L_{90} .

PROJECT DESCRIPTION

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 (gen-tie line, etc.).

DR PD-1. Please provide a list of current assessor's parcel numbers for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1,000 feet of the energy storage facility and related facilities. Provide a map showing the assessor's parcels in the project study area.

Under Public Resources Code, Div. 15, Energy Conservation and Development (25000-25966.1), and Chapter 6.2, Certification of Non-fossil Fueled Powerplants, Energy Storage facilities, and Related Facilities (25545-25545.13) [25545.2] the application is required to include evidence that the applicant has the legal right to currently access, construct, and operate the facility.

DR PD-2. Please provide written proof of site control, by means of appropriate signed contract documentation, agreement, etc., evidencing the real property rights to the proposed project site, gen-tie line, and all ancillary elements of the proposed project.

PUBLIC HEALTH

Section 2, Project Description, page 2-10 states that the BESS would be constructed in accordance with applicable federal, state and local fire codes, which includes the current California Fire Code (CFC). Chapter 12, Section 1207.1.1 of the 2022 CFC requires that all BESS systems pass UL 9540A large-scale fire testing and Section 1207.31 requires that all BESS systems be listed in accordance with UL 9540 system safety certification. Additionally, Chapter 12, Section 1207.6 of the 2022 CFC requires technology-specific protection requirements that may include explosion control and thermal runaway safeguards, depending on the battery type employed for the BESS system.

To further assist CEC staff and the public in their review of the air quality and public health impacts during battery thermal runaway/fires, staff requests the following supplemental information:

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

laboratory preparation methods, analytical methods, the MDL (method detection limit) or PQL (practical quantitation limit) or RL (reporting limit) for all measured constituents, and all QA/QC (quality assurance/quality control) data including results of a spiked sample.

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

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

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

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

DR PH-4. Please compare the modeled fire-related TACs concentrations to the Office of Environmental Health Hazard Assessment (OEHHA) /California Air Resources Board (CARB) 1-hour acute Reference Exposure Levels (RELs) and demonstrate whether the acute hazard Index (HI) of TACs would be higher than the significance threshold of 1.0 at sensitive receptors. If an OEHHA 1-hour acute REL is not available, a level 1 U.S. EPA Acute Exposure Guideline Level (AEGL) shall be used as the threshold of significance. Please demonstrate whether the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards. If exceedances occur, provide a detailed

Emergency Response Plan and outline the applicable regulatory notification requirements.

Section 5, Environmental analysis, page 5.7-3 states that the closest residence to the Project site is an isolated residence located approximately 1.8 miles to the east. However, page 5.7-12 states that the closest permanent residence is located approximately 1.2 miles to the north. Page 5.9-2 states that the nearest residential receptors are 9,700 feet southeast of the Project near Altamont Pass Road.

DR PH-5. Please clarify the nearest residential location to the project site.

SOCIOECONOMICS

California Code of Regulations, title 20, Appendix B (g)(7)(A)(iii) requires the existing and projected unemployment rate. Table 3.10-5 in Section 3.10 Socioeconomics (TN 264232) of the application provides the existing unemployment rate.

DR SOCIO-1. Provide the projected unemployment rate of the region affected by the construction and operation of the project.

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

The information for parks and recreation facilities, and libraries was not included in the application.

DR SOCIO-2. Provide the capacities, service standards, and existing and expected use levels of parks and recreation facilities, and libraries.

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

for police protection, fire protection, emergency services, parks and recreation facilities, libraries, and other public facilities.

The response times to hospitals and for police protection, emergency services, parks and recreation, and libraries were not included in the application.

DR SOCIO-3. Provide response times to hospitals and for police protection, emergency services, parks and recreation facilities and libraries.

SOILS

California Code of Regulations, title 20, Appendix B (g)(15)(A)(iv) requires the location of any contaminated soils that project construction could disturb. Section 5.11 Soils does not state if contaminated soils are present or absent at the proposed project site.

DR SOILS-1. Provide the locations of any contaminated soils that project construction could disturb. If project construction would not disturb contaminated soils, state so. Include available supporting evidence.

TRANSPORTATION

California Code of Regulations, title 20, § 1704, (a) (3) (A) requires the descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.

DR TRANS-1. Provide descriptions of the assumptions, methodologies and computational methods used within the analysis of intersection levels of service, queuing and vehicle miles traveled.

California Code of Regulations, title 20, Appendix B (g)(1) requires the application provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference

materials used such as general plan or other adopted local, regional, or statewide plan.

DR TRANS-2. Provide a list and description of all relevant federal, state, and local regulations, goals, plans, and policies which affect the project.

The analysis of existing (and future) conditions appears to be conducted using traffic volumes obtained from a travel demand model rather than ground counts of actual traffic volumes. Traffic volumes on I-580 are backed up by information from Caltrans' Performance Management System, which is acceptable. Please provide traffic counts on Altamont Pass Road and Grant Line Road and revise the analysis accordingly. The counts should include data on both automobiles and the percentage of heavy vehicles on the affected roadways.

Provide an assessment of intersection level of service and queueing during peak construction periods at the Grant Line Road/Interstate 580 interchange ramp terminal intersections. The interchange assessment should be performed in accordance with the requirements of the *Caltrans Local Development Review Safety Review Practitioners Guide* (Caltrans Division of Safety Programs, February 2024). That document indicates that *"If the Project adds two or more car lengths to the ramp queue that would extend into the freeway mainline, then the location must be reviewed for traffic safety impacts. This review must evaluate speed differential between the off-ramp queue and mainline of the freeway during the same period."*

California Code of Regulations, title 20, Appendix B (g)(5)(B) requires the application include the information if the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should

include:

- A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities.
- A thermal plume analysis that describes the plume's velocity;
- A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and
- Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.

DR TRANS-3. The proposed project appears to be within 4 miles of the Byron Airport. Confirm distance per statutory requirements and provide the information required in California Code of Regulations, title 20, Appendix B (g)(5)(B).

California Code of Regulations, title 20, Appendix B (g)(5)(C) requires the application provide an evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:

- The local jurisdiction's thresholds of significance;
- Methodologies (such as local VMT Evaluation Tool);
- VMT heat maps; and
- Transportation demand management plans and any documents supporting the project applicant's CEQA determination.

DR TRANS-4. Provide an assessment of the project's VMT impacts during both operations and construction phases. Recently, the Fourth District Court of Appeal held that the VMT screening thresholds adopted by County of San Diego under the guidance of Senate Bill 743 (SB 743) — specifically the "small-project" threshold (projects generating fewer than 110 daily automobile trips) are invalid because they lack substantial evidentiary support. Absent substantial local evidence backing up the validity of the small project screening criteria, it is no longer applicable in the State of California.

Provide average one-way trip length for construction worker trips, construction delivery trips and home-work trips during the operations phase of the project.

California Code of Regulations, title 20, Appendix B (g)(5)(D)(i) requires the application provide information on road classification and design capacity.

DR TRANS-5. Provide the relevant roadway classifications per the Alameda County General Plan and East County Area Plan.

TRANSMISSION SYSTEM DESIGN

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

Complete descriptions of the project transmission and interconnection facilities are also required to determine whether the project, as proposed, would comply with California Public Utilities Commission (CPUC) General Orders (GO) 95, 128, and 131-D construction standards. Therefore, please provide following information:

DR TSD-1. The applicant provided the Appendix "A" Reassessment, but it does not provide sufficient information to determine all the impacts on the grid. Please provide, as separate files, the following documents as shown below:

1. Queue Cluster 11 Phase II Interconnection Study Report; PG&E Area Report
 - Appendix and attachments
2. Queue Cluster 11 Phase II Appendix A-Q1461
 - Attachments
3. Affected System Studies

4. All and most recent Interconnection Reassessment Study Reports - Addendums
5. Large Generator Interconnection Agreement

DR TSD-2. Please provide detailed PG&E Ralph Substation's one-line diagram and details of the proposed project interconnection. Show all equipment ratings including bay arrangement of the breakers, disconnect switches, buses, generator tie-line, line rating, and other equipment.

DR TSD-3. Please provide detailed description of the proposed alternative substation and alternative gen-tie. Explain the interconnection between the proposed project and point of interconnection to the PG&E transmission system. Show all equipment ratings.

DR TSD-4. Please provide detailed alternative Substation's one-line diagram with the proposed project interconnection. Show all equipment ratings including bay arrangement of the breakers, disconnect switches, buses, generator tie-line, line rating, and other equipment.

DR TSD-5. Please provide the generator tie-line size, type and current carrying capacity.

DR TSD-6. Please discuss transmission line, substation or switchyard's compliance with relevant General Orders (GO) 95, 128, and 131-D standards.

VISUAL RESOURCES

The California Code of Regulations, Appendix B(g)(6)(D)(v), requires the applicant to provide a project specific conceptual outdoor lighting control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.

DR VISUAL-1. Please provide a project specific conceptual outdoor lighting control and management plan, and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.

The California Code of Regulations, Appendix B(g)(6)(D)(v) a., requires the applicant to provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non-cutoff) and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires locations on a diagram or elevation.

DR VISUAL-2. Please provide a list of the project-specific luminaires, identify the design, and show the project-specific luminaires locations on a diagram or elevation.

WASTE MANAGEMENT

California Code of Regulations, title 20, Appendix B (g) (12) (B) requires that the Application include a description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.

Section 5.14.1.2.2 states hazardous waste generated during the operation phase of the project would include “used lubricating oil, oily rags, batteries, and fire extinguishers.” However, Table 5.14-2 Potential Wastes Generated during Project Operations does not include lubricating oils and does not discuss the estimated quantity of lubricating oils that would be generated.

DR WASTE-1. Provide the origin, composition, estimated quantity, classification and disposal information for the lubricating oils described in Section 5.14.1.2.2.

California Code of Regulations, Title 24, Part 11 (CALGreen) includes requirements for construction waste management. In addition, Alameda County also has requirements contained in their Construction and Demolition Debris Management Plan.

DR WASTE-2. Please include these requirements in the waste management plan.

WATER RESOURCES

California Code of Regulations, title 20, Appendix B (g) (14) (B) requires a detailed description including physical and chemical characteristics of nearby surface water bodies. The project site lies upstream of Bethany Reservoir, but this reservoir is not characterized with the required chemical and physical characteristics. Bethany Reservoir connects to the California aqueduct and is an important source of water for the region.

DR WATER-1. Please provide more details on the chemical characteristics of Bethany Reservoir and how the reservoir would be affected by runoff from the project.

California Code of Regulations, title 20, Appendix B (g) (14) (C) (ii) requires identifying the expected chemical characteristics of discharge water. On page 5.16-9 it's stated that if water stored on-site were used for firefighting, the subsequent fire extinguishing waste would be captured by the stormwater system. This is not mentioned in the water resources section and this waste stream is not characterized within the context of the stormwater waste stream.

DR WATER-2. Please include the chemical characteristics of anticipated waste products from firefighting into the discussion of discharged waters. This should include both firefighting chemicals and waste for batteries subject to fire. Please also explain what would happen to other fire extinguishing waste that could be brought to the site in excess of the amount stored on-site.

California Code of Regulations, title 20, Appendix B (g) (14) (iii) requires a discussion on the effect of construction and operation of the project on water quality. As stated above, firefighting waste was not discussed in the context of water quality in this Water Resources section. The project site drains directly to Bethany Reservoir, a part of the California Aqueduct, and the application states that firefighting waste could potentially drain directly to the reservoir from the project site via the proposed stormwater drainage system.

DR WATER-3. Please discuss the effect of fire at the project site, whether due to wildfire or batteries in thermal runaway (but not exclusively), and how the fire waste products would be mitigated by best management practices and project design.

California Code of Regulations, title 20, Appendix B (g) (14) (C) requires identification of, and a will-serve letter from the specific water purveyor that would service the project.

DR WATER-4. Please identify the water purveyor that would service the project. In addition, please supply a will-serve letter from that purveyor. If it is not possible to supply a will-serve letter, please discuss assurances from the chosen purveyor to serve the project.

California Code of Regulations, title 20, Appendix B (g) (14) (vii) requires identifying evidence, references and calculations used in the analysis. Appendix 5.15-A "Hydrology & Hydraulics Report" contains details that should be referenced in the application text. The report is not named in section 5.15 nor in the index to the application, so it is unclear what technical work the application is relying on specifically.

DR WATER-5. Please identify all assumptions, evidence, references, and calculations used to analyze section 5.15 and make sure Appendix 5.15-A, as well as any other supporting documents, are referenced in the text.

WILDFIRE

California Code of Regulations, title 20, Appendix B (g) (19) (C) (ii) requires that the application include a discussion of how potential project pollutants could be contained onsite during a wildfire event. The Application states that the "Project would include a stormwater drainage system sized to accommodate 3.93 inches of precipitation in a 24-hour period (100-year storm event) and to comply with applicable local codes and standards. If the water stored onsite were used for fighting a fire, this water would be contained by the Project's stormwater control system and would not expose people or structures to risks as a result of runoff."

The Application does not provide sufficient detail of how to contain runoff of water used for fighting a fire that exceeds the storage capacity of the stormwater drainage system. The discussion lacks detail on how excess/overflow water runoff with potential pollutants would be prevented from entering the storm drain system and flowing offsite.

DR WF-1. Provide a discussion of how water runoff from wildfire

or firefighting activities would be contained onsite during a wildfire event (including a situation when the volume exceeds the capacity of the stormwater system).

WORKER SAFETY AND FIRE PROTECTION

The Application includes Table 5.17-5 listing Laws, Ordinances, Regulations, and Standards for Worker Health and Safety. However, Table 5.17-5 does not include critical LORS related to BESS requirements that would be relied upon for the outlines of the Construction/Operation Health and Safety Programs as required by California Code of Regulation, title 20, Appendix B (i) (1) (A). Furthermore, Table 5.17-5 does not include explicit references to pages in the Application and the project's conformance with the table's LORS. Table 5.17-7 also does not include permits related to local fire department reviews of fire extinguishing and fire suppression systems as required by California Code of Regulation, title 20, Appendix B (i) (1) (B).

DR WS-1. Provide a revised Table 5.17-5 with specific references to BESS requirements, including the 2026 edition of NFPA 855 (available now), California Fire Code requirements for electrical energy storage systems: Title 24, Part 9, Chapter 12, Section 1207, and local fire department requirements.

DR WS-2. Provide a revised Table 5.17-5 with the Opt-in application page references and the project's conformity.

DR WS-3. Provide a revised Table 5.17-7 of applicable state and local agencies with jurisdiction to issue permits, and a list of the specific permits, for worker health and safety, and fire extinguishing and fire suppression systems during construction and operations.

California Code of Regulations, title 20, Appendix B (g) (11) (C) requires draft outlines including for the Fire Prevention Plan, and Emergency Action Plan. Furthermore, California Code of Regulations, title 20, Appendix B (g) (11) (A) requires a description of safety training programs. Subsection 5.17.2.3 includes bulleted lists of topics that would be included in the Fire Protection and Prevention Program, and Emergency Action Program/Plan. However, the outlines lack significant detail on project-specific potential fire hazards and control procedures as required by California Code of Regulations, title 8,

sections 3220 and 3221.

DR WS-4. Provide draft outlines of the project's Fire Prevention Plan for construction and operations. Provide a discussion of project-specific potential fire hazards, control procedures, fire protection systems, etc.

DR WS-5. Provide draft outlines of the project's Emergency Action Plan for construction and operations.

DR WS-6. Provide a discussion of the local emergency management agencies, unified program agencies, and local first response agencies that the applicant would coordinate with in developing the emergency response and emergency action plan.

DR WS-7. Provide a complete description of the proposed training programs for the Operations Fire Prevention Plan and Emergency Response/Action Plan. Provide a discussion of proposed training provided to the operations personnel and the local first response agencies (fire department).

California Code of Regulations, title 20, Appendix B (g) (11) (C) requires draft outlines including for the Emergency Action Plan. Figure 2-1 and Figure 2-2 illustrate the project's general arrangement and equipment elevations for the proposed BESS enclosure, Tesla Megapack 2XL. However, the Application does not provide critical details related to the BESS location and installation that would be relied upon for the development of the Emergency Action Plan. For example, Figure 2-1 calls out a single BESS access road, does not specify emergency responder access gates, and does not specify BESS setbacks from the property lines. Furthermore, subsection 5.5.2.5.2 mentions a fire wall around the perimeter of the BESS area that is not detailed in the figures.

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

DR WS-8. Provide a discussion of how the project general arrangement would comply with the Alameda County Fire Department requirements for minimum separation and setback distances and would provide at least two emergency access points.

Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

DR WS-9. Provide a discussion of how the separation distances between the BESS enclosures and the other nearest exposures comply with LORS (e.g. NFPA 855, California Fire Code, etc.) and would mitigate adverse impacts during an emergency response. Provide a complete description of the proposed fire wall around the perimeter of the BESS area. Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

California Code of Regulations, title 20, Appendix (g) (1) requires a discussion of the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. The Application does not detail proposed measures to mitigate adverse impacts during an emergency response. For example, the Application describes the project as remotely monitored offsite, with only monthly onsite visits by up to two staff. Appendix 5.10B and Table 5.16-1 also demonstrate emergency response times of at least 21 to 35 minutes. These conditions have the potential to contribute to adverse impacts during an emergency response, such as during incidents involving a BESS enclosure e.g. thermal runaway, or wildfire.

DR WS-10. Provide a discussion of the anticipated time for operations personnel to arrive onsite following an emergency or notification by the monitoring system.

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

DR WS-12. Provide a discussion of the proposed remote monitoring capabilities, such as dedicated incident command center, thermal infrared cameras, air/water sampling plans, to aid the incident commander, local first response agencies, etc. during an incident involving a BESS enclosure. Provide a complete description of the battery energy storage management system for the proposed BESS enclosure, Tesla Megapack 2XL.

DR WS-13. Provide a complete description of the proposed measures for supplying additional fire water supply during extended emergency conditions.

DR WS-14. Provide a history of failure incidents involving the proposed BESS enclosure, Tesla Megapack 2XL. Provide a complete description of the proposed measures to prevent failure incidents for the proposed project.

California Code of Regulations, title 20, Appendix B (g) (11) (B) requires a complete description of the fuel handling system and the fire suppression system. Subsection 5.17.2.4 does not discuss fire protection systems during operations. Subsections 2.2.1.4 and 5.5.2.5 provide additional information but lacks significant details on the fire extinguishing and fire suppression systems for the O&M areas and the BESS enclosures. The proposed BESS enclosure, Tesla Megapack 2XL, does not include a built-in fire suppression system (e.g. water-based, gaseous, etc.), but as Subsection 5.5.2.5 states, "Tesla Megapacks (or similar) have built-in systems for controlling off-gassing and are designed to limit any thermal runaway events to individual Megapacks (or similar)."

Staff requires additional details for the project's proposed fire prevention, extinguishing, and 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, including photo or diagram of a typical battery unit (container/enclosure). A complete description specifies information including, but not limited to, the location(s) of project features, the specific listings and design standards, the more stringent local fire department requirements, and all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.

DR WS-15. Provide a schematic and complete description of the proposed fire suppression systems for the project site, including the fire water line, fire water storage tanks, fire pumps, fire hydrants, etc.

DR WS-16. Provide a schematic and complete description of the proposed fire suppression systems for all project buildings and structures, including the O&M pad/areas, fire pump area, control

building, etc.

DR WS-17. Provide a schematic or photo and complete description of the built-in features of the proposed BESS enclosure, Tesla Megapack 2XL, that would be intended to mitigate against a failure incident involving a BESS enclosure e.g. thermal runaway. Provide the BESS manufacturer's technical data sheet including the specifications, ratings, and listings of the proposed BESS enclosure, Tesla Megapack 2XL.

California Code of Regulations, title 20, section 1704 (a) (3) (A), requires descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. California Code of Regulations, title 20, section 1704 (a) (3) (B), also requires the description to include the methodologies and findings of all major studies or research efforts undertaken and relied upon to provide information for the document. Subsection 2.2.1.4, Fire Protection and Safety Systems, references an approximately 28,000-gallon fire water tank as the project's sole water supply for fire protection. Furthermore, subsection 5.17.2.4 does not discuss fire protection systems during operations. The Application does not provide references to support the conclusion that the 28,000-gallon fire water tank would serve as an adequate water supply. No ability to replenish water is described.

Staff requires additional details of the research efforts the applicant has completed or plans to complete related to the project's fire protection systems. Examples of such research efforts include the Hazard Mitigation Analysis (HMA) and fire water supply analysis.

DR WS-18. Provide a discussion of the estimated 28,000 gallons of water supply for the project's exposure hazards (e.g. transformer fire, BESS fire) and how the water supply would be replenished during an emergency event. Provide the project's worst-case fire flow requirements in GPM (gallons per minute). Provide descriptions of all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

DR WS-19. Provide the Safety Data Sheets for hazardous materials contained in the proposed BESS enclosure, Tesla Megapack 2XL.

DR WS-20. Provide the UL 9540A cell, module, and unit level test

reports for the proposed BESS enclosure, Tesla Megapack 2XL.

DR WS-21. Provide a draft outline of the project's Hazard Mitigation Analysis for the proposed BESS enclosure, Tesla Megapack 2XL. Include a complete description of how the Hazard Mitigation Analysis would comply with the California Fire Code and the local fire department requirements.

California Code of Regulations, title 20, Appendix B (g) (11) (B) requires a complete description of the fuel handling system and the fire suppression system. Subsection 2.2.1.4 describes the use of diesel fuel for emergency operations. However, the Application does not provide details of the diesel fuel management systems. Furthermore, the Application does not provide detailed information on the fuels required by emergency and standby power systems.

DR WS-22. 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.

DR WS-23. Provide a complete description of the proposed fuel management and handling during both construction and operations, including details on fuel delivery and distribution methods and systems, containment systems, and fire protection measures to be implemented (e.g., static electricity mitigation, etc.).

DR WS-24. Provide a detailed site map or diagram showing the location of the underground pipeline and all proposed facilities. Please list the distance from the pipeline to all the facilities/areas mentioned above.