DOCKETED	
Docket Number:	25-SPPE-01
Project Title:	Vernon Backup Generating Facility
TN #:	267853
Document Title:	GEP Vernon Supplemental Responses to CEC Data Request Set 1 - VBGF - Final
Description:	N/A
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Submitter Role:	Applicant Representative
Submission Date:	12/8/2025 9:53:11 AM
Docketed Date:	12/8/2025

SUPPLEMENTAL RESPONSES TO CEC STAFF DATA REQUEST SET 1

GEP Vernon Backup Generating Facility (25-SPPE-01)

SUBMITTED TO: CALIFORNIA ENERGY COMMISSION
SUBMITTED BY: GIC Vernon, LLC

December 2025

DAYZEN LLC

INTRODUCTION

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

GEOLOGY

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

DATA REQUEST

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

RESPONSE TO DATA REQUEST EXEC GEO-6

Langan CA Inc., the geotechnical consultant that prepared the preliminary geotechnical investigation and report provide in Appendix E of the SPPE Application, provides the following response.

The 1998 CDMG map is the standard of practice for determining historical high groundwater in California; these maps were developed as part of the Seismic Hazard Mapping Act post 1994 Northridge Earthquake; more recent mapping is not currently available.

It should be noted that mapping is extremely conservative and incorporates data from a study performed in 1905 (Mendenhall) that was commissioned decades prior to the on-set of intensive groundwater pumping in the Los Angeles Basin that was initiated post WW 1 and continued largely uncontrolled until the 1950's when seawater intrusion began due to the lowering of the groundwater level within the Los Angeles basin on the order of hundreds of feet. To combat the seawater intrusion, two massive public works efforts (The West Basin and Dominguez Gap barrier projects) were implemented in the late 60's and early 70's and consisted of re-injecting water to balance/mitigate the potential for seawater intrusion into the fresh-water aquifer. These projects remain active today as groundwater pumping for consumption remains robust due to ever increasing demand.

Noting that liquefaction is generally considered possible within the upper 50 feet, the groundwater level in the greater Los Angeles basin would need to rise approximately 155 feet for liquefaction to even be a consideration. Considering such a condition was not present circa 1905, prior to the on-site of the massive groundwater pumping, it's

reasonable to conclude that the groundwater level at the site will never be shallower than approximately 60 feet and furthermore in order for that condition to occur, essentially all groundwater pumping in the Los Angeles basin would need to be terminated.

We did not encounter groundwater in our subsurface exploration at the site in 2023 to a maximum depth of 75 feet and current groundwater mapping available from the Water Replenishment District (WRD) indicate the current groundwater level at the site is approximately 5 feet below mean sea level (msl). Noting that the ground surface level at the GEP site is approximately 205 msl, the current depth to groundwater at the site is approximately 205 feet.

Therefore, the potential for liquefaction is not present at this site.

PROJECT DESCRIPTION

DR PROJECT DESCRIP-3. Please provide information that reviews the frequency and duration of historic outages of the Leonis Substation and related facilities that would likely trigger the loss of electric service to the proposed onsite substation and could lead to the emergency operations of the diesel- powered generators. This response should identify the reliability of service historically provided by VPU to similar customers in this part of its service territory.

RESPONSE TO DATA REQUEST PROJECT DESCRIP-3

GIC Vernon requested this information from VPU who provided the following response.

The following pertains only to the instances of outages experienced on VPU's 66kV lines – which are the transmission lines and the only voltage VPU would serve the GEP.

Below is a chart that outlines the number and duration of outages per year for the past 10 years, and which confirms VPUs power reliability to its customers.

YEAR	DURATION	CAUSE
2024	01:21:05	Large bird near transformer
	01:43:18	Mylar balloon
	04:29:35	Car hit pole
	01:25:32	Balloon
2023	00:10:05	Truck hit pole
2022	00:05:05	Relay Issue
	17:48:26	Car hit pole
	02:21:01	Car hit pole
2021	02:08:11	Car hit pole
	00:29:32	lightning
	00:56:10	Balloon
	00:02:12	Balloon
2020	01:21:34	Balloon
	00:10:30	Balloon
	00:03:18	Truck hit pole
	00:44:27	Balloon
	00:52:38	Truck hit pole
2019	00:20:02	Relay Tripped
2018	00:07:40	Bird contact w/ conductor
	01:31:37	Balloon
2017	00:26:28	Balloon
2016	02:40:00	Balloon
2015	No Outages on 66kV	

With the exception of one outage during the 10-year period, all have been less than a few hours, with the majority restored in one hour or less.

It is also important to note that more than 80% of VPU's distribution/transmission system is overhead. Although the likelihood of reducing the number of outages from car-hit poles may still continue, VPU believes that since the GEP will be served by two independent circuits, the likelihood of two independent circuits being affected by a mylar balloon or a car-hit pole at the same time is very slim. State law passed in 2023 requires the

development of a standard for safer, non-conductive foil balloons by 2027, and with all others to be phased out by 2031. VPU estimates that by 2027, there will be a decrease in mylar balloon-related outages.

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

RESPONSE TO DATA REQUEST PROJECT DESCRIP-4

GIC Vernon requested this information from VPU and provided the following response. The GEP will be fed by two independent circuits, each capable of handling the full 99 MW load. So, in order for the data center to experience an outage, there would have to be an impact to both circuits at the same time before the generators or the UPS would run. Therefore, VPU expects the GEP would experience less outages than those identified in the table above. Additionally, VPU has not identified in any upgrades other than the transmission lines and VPU on-site Substation described in the SPPE Application.

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

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

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

RESPONSE TO DATA REQUEST PROJECT DESCRIP-5

GIC Vernon requested this information from VPU and provided the following response.

VPU does not participate in PSPS – VPU's service territory is 5.2 square miles, not located by any vegetation, and therefore not considered to exist in a wildfire zone. VPU can electronically and visually monitor its distribution system and remotely de-energize circuits to respond quickly to any emergency situations (natural or man-made).