DOCKETED	
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Project Title:	Enterprise Emergency Peaker Project - Compliance
TN #:	268054
Document Title:	CEC Data Response - Enterprise Hazardous Materials, Worker Safety, and Fire Protection - Vol 1_Body through App B
Description:	Response to Data Request for Enterprise Emergency Peaker Project, Docketed Date 11/4/2025 (Volume 1 of 3).
Filer:	Grace Myers
Organization:	Rincon Consultants, Inc.
Submitter Role:	Applicant Consultant
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Enterprise Emergency Peaker (01-EP-10C)
Enterprise BESS Project

CEC Hazardous Materials Management/Worker Safety and Fire Protection Data Request Response No. 2

prepared for

Enterprise BESS LLC
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Escondido, California 92029

prepared by

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December 2025

RINCON CONSULTANTS

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Tables

Figures

Appendices

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1 Introduction

On November 4, 2025, Enterprise BESS, LLC (Applicant) received a second Data Request (Data Request No.2) from the California Energy Commission (CEC) for the Enterprise Emergency Peaker Project (01-EP-10C) in response to the Applicant's petition to amend (TN# 255290, March 18, 2025) for the Enterprise BESS Project. The following document provides the Applicant's responses to the Data Request received from the CEC. Table 1 lists all Data Requests for which a response is provided below.

Table 1 Data Responses Included in Response No. 2

Data Request Resources Area	Data Request (DR) Number
Hazardous Materials Management	DR-1 through DR-5
Worker Safety and Fire Protection	DR-6 through DR-30

The responses are grouped by individual discipline or topic area and are presented in the same order and with the same numbering provided by the CEC. New or revised tables and/or attachments are provided throughout and as appendices to this document. The responses included in this document are considered complete responses to the corresponding Data Requests.

2 Hazardous Materials Management

2.1 Data Request-1 through -5

Data Request-1 and -2

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

- **DR-1:** Provide a description of proposed site security measures during the construction phase of the proposed Battery Energy Storage System (BESS) project.

  Response: For site security during the construction phase of the proposed Enterprise BESS Project, a 6-to 8-foot mesh-lined fence will surround the approximately 0.82-acre site located at 2361 Auto Park Way. The fence will have approximately 1 foot of barbed wire extending on the top. Additionally, site security will include Site Security Mobile Cameras with lights, which will provide total site coverage. The proposed approximate location of the cameras as well as the area that would be covered by the cameras is shown in the Site Security Plan (Appendix A).

- **DR-2:** Provide a description of the BESS project site access from the existing Enterprise Emergency Peaker Plant.

  Response: The Enterprise BESS Project site is located at 2361 Auto Park Way in Escondido, California. The interconnection facilities are located to the south on the Enterprise Emergency Peaker Plant (EEPP) at 201 Enterprise Street in Escondido, California. Although the BESS and EEPP parcels are adjacent, direct onsite access between the properties is not proposed. Street access from the EEPP site to the BESS site is via southbound Enterprise Street to westbound Auto Park Way. The total driving distance is approximately 0.2 mile. Operation, maintenance, and security personnel at the EEPP site would typically transit back and forth between the sites, as needed, via street legal utility carts. See Figure 1 for the proposed route.

Figure 1 Proposed Driving Route Between BESS and Interconnection Sites

Data Request-3 through -5

The applicant describes toxic and flammable gases as key hazards with BESS on page H-4. Explosion control measures are described on page A-48 under the Public Services/Fire Protection analysis. The applicant stated, "Each battery container will be equipped with a blast door designed to deploy in the event of an explosion and direct any hot gas and energy upwards and away from any adjacent equipment or personnel." Staff require additional details on the proposed explosion control and gas detection systems in order to verify that the project has proposed adequate project features to mitigate adverse impacts to operations personnel, emergency first responders, and the public. Staff require complete descriptions of project features. A complete description specifies information including, but not limited to, the location(s) of project features, the specific listings and design standards, the more stringent local fire department requirements, and all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document

- **DR-3:** Provide a schematic of the proposed battery container gas detection systems and a detailed description of these systems. Provide a discussion of the specific gas(es) or vapor(s) intended to be detected.

  Response: The schematic and description of the proposed battery container gas detection system is included in Appendix B. Detailed description of battery container gas detection systems is located in Section 3.4 of the Hazard Mitigation Analysis prepared by Coffman Engineers (Appendix C).

- **DR-4:** Provide a schematic of the proposed battery container explosion control systems and a detailed description of these systems.

  Response: A detailed description of battery container explosion control systems located in Section 3.4 of the Hazard Mitigation Analysis prepared by Coffman Engineers (Appendix C). More details and schematics of the battery container explosion control systems are included in

the NFPA 69 Analysis Report (Appendix E of the Hazardous Mitigation Analysis). Appendix B of this report includes the Battery Container Gas Detection System Schematic and Description.

- **DR-5:** Provide a description of how the proposed battery container explosion control systems will comply with the applicable National Fire Protection Association (NFPA) standards (e.g., NFPA 68, 69, 855, etc.) and the local fire department requirements.

  Response: Description of battery container explosion control systems compliance with applicable fire codes located in Section 3.4 of the Hazard Mitigation Analysis prepared by Coffman Engineers (Appendix C). Additionally, an NFPA 69 Analysis Report has been prepared by the Original Equipment Manufacturer (OEM) and is located in Appendix E of the Hazard Mitigation Analysis (Appendix C).

3 Worker Safety and Fire Protection

3.1 Data Request-6 through -30

Data Request-6 through -11

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

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

- **DR-6:** Provide the BESS manufacturer's technical data sheet including the specifications, ratings, and listings of the BESS manufacturer/model being proposed.

  Response: BESS manufacturer's technical data sheets including the specifications, ratings, and listings are provided in the NFPA 69 Analysis Report prepared by the OEM as included in Appendix E of the Hazard Mitigation Analysis (Appendix C).

- **DR-7:** Provide the Safety Data Sheet for hazardous materials contained in the BESS manufacturer/model being proposed, including related to the fire suppression system and liquid-coolant air conditioning system.

  Response: Safety Data Sheets for the hazardous materials contained in the BESS are located in Appendix D of the Hazard Mitigation Analysis prepared by Coffman Engineers (Appendix C).

- **DR-8:** Provide the UL 9540A cell, module, and unit level test reports for the BESS manufacturer/model being proposed.

  Response: UL 9540A cell, module, and unit level test reports can be found in Appendix B of the Hazard Mitigation Analysis prepared by Coffman Engineers (Appendix C).

- **DR-9:** Provide a description of how the hazard mitigation analysis for the proposed BESS technology will comply with the California Fire Code section 1207.1.4, the applicable NFPA standards (e.g., NFPA 855), and the local fire department requirements.

  Response: A Hazard Mitigation Analysis has been prepared by Coffman for the SYL Energy Storage System (ESS) enclosures in accordance with CFC 1207.1.4, applicable NFPA standards and local fire department requirements. The Hazard Mitigation Analysis can be found in Appendix C.

- **DR-10:** Provide a draft outline of the information that would be included in the Hazard Mitigation Analysis for the BESS manufacturer/model being proposed.

  Response: A Hazard Mitigation Analysis has been prepared by Coffman for the SYL ESS enclosures in accordance with CFC 1207.1.4. The Hazard Mitigation Analysis can be found in Appendix C.

- **DR-11:** Provide a history of failure incidents utilizing the BESS manufacturer/model being proposed. Provide a complete description of the proposed measures to prevent failure incidents for the proposed project.

  Response: Based on information provided by the BESS Manufacturer, there is no history of failures observed at this time for the proposed SYL enclosure (SYL SU3794U3794KC) that will be utilized for this project and that is referenced to address this request. The SYL enclosure has been tested and listed in accordance with the latest UL9540 requirements and utilizes more advanced lithium-ion battery technology, which per the OEM, offers a higher level of safety and thermal stability than other battery technology used in the past.

Data Request-12 through -15

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

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

- **DR-12:** Provide a description of how the proposed BESS project will comply with the 2026 edition of the NFPA 855 Standard for the Installation of Stationary Energy Storage Systems.

  Response: The applicable code for the project is the 2025 California Fire Code which adopts the 2023 edition of NFPA 855. While the 2026 edition of NFPA 855 is not adopted as a reference standard, this edition will be considered as guidance standard for the project.

- **DR-13:** Provide correspondence with the City of Escondido Fire Department detailing the location and installation requirements for the BESS project (e.g., access roads, setbacks, etc.).

  Response: The applicant has consulted with the Escondido Fire Department and received input regarding access, setback considerations, fire water criteria, etc. In addition, the applicant team has obtained input from the Fire Department regarding firefighting resources and response capabilities. Documentation of the consultations with the Fire Department are attached to this data request response as Appendices D.1 through D.3.

- **DR-14**: Provide plans of the BESS project that specify the minimum clearances between the BESS containers' exposure hazards including but not limited to buildings, lot lines, and fire barriers if used.

  Response: The Fire Access Plan (Appendix E) details the distances between the BESS containers and the distances to lot lines (shown as 11.8 feet).Buildings and fire barriers are not part of the proposed project.

- **DR-15:** Provide a discussion of how the BESS project design satisfies the local fire department requirements for minimum separation and setback distances. Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions

  Response: The BESS project location is considered to be an installation near exposures in accordance with CFC 1207.8.2 since the site is not located more than 100 feet from buildings, lot lines, and public ways. The BESS project design complies with the setback distances and clearance to exposures in accordance with CFC 1207.8.3. The BESS enclosures are located a minimum of 10 feet away from lot lines, public ways, buildings, and other exposure hazards (CFC 1207.8.3). Additionally, the test results from the UL 9540A Unit Level test demonstrated a

rise in temperature of 11.9 degrees Celsius from ambient condition (28.9 degrees Celsius) at the target wall, which was located less than 6 inches away from the initiating BESS unit. This small change in temperature would not threaten adjacent BESS enclosures or other exposures on site.

Data Request-16

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

Staff requires additional details on the proposed fire extinguishing and fire suppression systems in order to verify that the project has proposed adequate project features to mitigate adverse impacts to operations personnel, emergency first responders, and the public. Staff require complete descriptions of project features. A complete description specifies information including, but not limited to, the location(s) of project features, the specific listings and design standards, the more stringent local fire department requirements, and all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.

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

  Response: The SYL ESS enclosures are classified as outdoor, non-occupiable installations. CFC 1207.5.5 requires "rooms" containing stationary storage battery systems to be equipped with an automatic sprinkler system and designed in accordance with NFPA 13. As they are not considered "rooms" within buildings, CFC 1207.5.5 does not require in-unit fire suppression systems. UL 9540A tests demonstrated that the SYL ESS enclosure design successfully prevents thermal runaway propagation between modules without an internal suppression system. This indicates that the SYL ESS enclosure design effectively contains fire hazards. While a fire suppression system is not required as stated above, the SYL ESS enclosures will be equipped with internal clean agent suppression system utilizing FK-5-1-12. A schematic of the fire extinguishing system is shown in Section 5.4.2 of the User Manual (Appendix C in Hazard Mitigation Analysis). More detail is provided in Appendix B of this report (Battery Container Gas Detection System Schematic and Description).

Data Request-17 through -22

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

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

- **DR-17:** Provide correspondence with the City of Escondido Fire Department detailing the fire protection system requirements for the BESS project.

  Response: The applicant team participated in a Microsoft Teams conference call with the City of Escondido, Deputy Fire Marshall, La Vona Koretke on December 3, 2025 (see Appendix D3 for meeting notes). As documented in the meeting notes, no specific fire protection system requirements were provided by the Deputy Fire Marshall, but she referred to CBC (2025), CFC, NFPA 855, San Diego County BESS Guidelines (see Section 2.4.6), and the UL 9540A results. La Vona stated that the project will need to comply with applicable codes and standards specific to this project design and site. The applicant and owner's engineer have considered the applicable requirements in the project design. The project's fire protection system measures include those described in the UL 9540A reports provided by the battery manufacturer and those discussed in the Hazard Mitigation Analysis (Appendix C), Emergency Response Plan (Appendix F), and Hazard Consequence Analysis (Appendix G), reports prepared by Coffman Engineers for the project.

- **DR-18:** Provide plans and/or a description of the amount and hydraulic performance of the existing City fire hydrant(s).

  Response: Coordination with Rincon del Diablo Municipal Water District is in-progress to determine the hydrant hydraulic performance.

- **DR-19**: Provide the worst-case fire water flow requirements in GPM (gallons per minute) during emergency conditions. Provide descriptions of all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

  Response: The project includes the installation of outdoor SYL ESS enclosures and associated electrical equipment. The existing auto body shop buildings on the BESS site will be removed as part of the project and the project will not include the construction of any new buildings. The SYL ESS enclosures are classified as ESS cabinets and are not classified as buildings per CFC Chapter 2 because personnel are not able to enter the enclosure and the enclosures are only accessible from the outside for testing and maintenance purposes.

Per CFC 1207.5.5, rooms and areas within buildings and walk-in units containing electrochemical ESS shall be provided by an automatic fire suppression system. As the project is utilizing SYL ESS enclosures that are not considered "walk-in" units, an internal fire suppression system is not required for the SYL ESS enclosures. Additionally, the results from the UL 9540A Unit Level test demonstrated that thermal runaway within a module would be contained within the module and would not propagate to adjacent modules without the use of a fire suppression system.

Testing data has shown that water-based fire suppression tactics are ineffective in mitigating thermal runaway within lithium-ion batteries. Per the ESS manufacturer, fire water used on site should only be used to cool adjacent ESS enclosures in the event of a fire involving an ESS enclosure, or to provide cooling water for other potential (non-battery related) fire events around the site.

Due to the absence of an occupiable building on site, the lack of an automatic water-based fire suppression system, and the primary function of fire water used on site, the team estimates the worst-case fire water flow requirement to be 1,000 GPM, which equates to 4 fire department handlines each delivering an estimated flow rate of 250 GPM.

- **DR-20:** Provide a schematic of the water-based fire protection system for the site of the BESS project and a detailed description of these systems, such as locations of fire water pipeline, fire water storage tanks, fire pumps, fire hydrants, etc.

  Response: Coordination with the manufacturer for the schematic of the water-based fire protection system is in progress.

- **DR-21:** Confirm whether the existing fire hydrant(s) satisfies the installation and performance requirements of the City of Escondido Fire Department as required for continued conformance with Condition of Certification PUB SER-2.

  Response: This will be addressed once fire flow testing has been performed to determine the available flow and pressure at the hydrants and fire riser. Coordination with Rincon del Diablo Municipal Water District is in-progress to determine the hydrant hydraulic performance.

- **DR-22:** Provide a complete description of the proposed measures for supplying additional fire water supply during extended emergency conditions.

  Response: During our coordination with the City of Escondido Fire Department, the Fire Department expressed a preference not to have a hydrant inside the BESS facility. They do require at least one fire hydrant within 400 feet of the BESS containers. Two hydrants are currently within 400 feet of the facility, including one street hydrant approximately 75 feet east of the site boundary on Auto Park Way. There is also a Fire Riser directly in front of the facility. Pressure and flow testing has been scheduled for the hydrants and the fire riser with Rincon del Diablo Municipal Water District to determine their effectiveness.

Data Request-23 through -27

A BESS Emergency Response Plan is mentioned on page A-48 under the Public Services/Fire Protection analysis. Emergency response is further discussed on pages H-7 and H-8. The applicant stated “Prior to operation of the Enterprise BESS Project, MRP will develop an Emergency Response Plan in coordination with the City of Escondido Fire Department that complies with the requirements of SB38.” Senate Bill No. 38 (2023, Laird) (SB38) pertains to battery energy storage facilities and requires an emergency response and emergency action plan.

- **DR-23:** Provide a draft outline of the information that would be included in the emergency response and action plan for the proposed BESS project during the construction and operation phases.

  Response: Coffman Engineers has prepared a full Emergency Response & Action Plan (Appendix F) for the BESS project that includes the construction and operations phases. Refer to Appendix I of the Emergency Response Plan for information during the construction phase of the project.

- **DR-24:** Provide a discussion of the local emergency management agencies, unified program agencies, and local first response agencies that the applicant will coordinate with in developing the emergency response and emergency action plan.

  Response: Incident response coordination and contact information are included in Section 3 of the prepared Emergency Response Plan (Appendix F).

- **DR-25:** Provide a discussion of the anticipated response time by local first response agencies for incidents involving a BESS (e.g., thermal runaway and fire). Provide a discussion of the fire response capabilities, EMS capabilities, and hazardous materials team for incidents involving a BESS.

Response: Incidents at the Enterprise BESS Project site (2361 Auto Park Way, APNs 232-41-19,20, -22) would be served within the Escondido Fire Dept's goal of 7.5 minutes, as practical, given circumstances at the time (e.g., traffic, other events occurring at the same time, etc.).

The North County area, serving San Diego's North County Region, is serviced under the North County Dispatch Joint Powers Authority system whereby all participating agencies supply fire response based on unit locations at any given time and the response needs of the event. All participating fire response engines/equipment are GPS equipped and computer dispatched. There are seven fire stations in Escondido and the closest Escondido stations to the site and likely first responders are:

- Station 1- Center City, 310 Quince St.
- Station 6- Del Dios Rd., 1735 Del Dios Rd.

In addition, stations in San Marcos and/or other Escondido stations could respond as appropriate.

- As per NFPA, the typical Uniform Response to an emergency would include:
  - Four (4) fire trucks
  - Ladder truck
  - Ambulance
  - Battalion Chief

In addition, more resources as needed would be requested and brought to the event.

- Hazardous material response would be handled by the San Diego County Hazardous Incident Response Team (HIRT) which responds jointly with the City of San Diego Fire & Life Safety Services Department, Hazardous Incident Response Team Unit. The San Diego County Department of Environmental Health and Quality (DEHQ) Hazardous Incident Response Team (HIRT) consists of ten California State Certified Hazardous Material Specialists. This team services all unincorporated San Diego County areas, 18 municipalities, 2 military bases, and 5 Indian Reservations. HIRT responds jointly with the San Diego Fire & Life Safety Services Department, Hazardous Incident Response Team to investigate and mitigate chemically related emergencies or complaints. Emergency response activities include mitigation, containment, and control actions as well as hazard identification, evaluating the threat to the local populations and the environment.
- **DR-26:** Provide a discussion of actions or proposed measures that the project could implement to mitigate impacts to the local first response agencies (fire department) due to an incident involving a BESS.

  Response: Incident response impact mitigation strategies are covered in Section 3 of the prepared Emergency Response Plan (Appendix F). This section defines the roles and responsibilities for site personnel, emergency contacts, tactical actions, emergency routes and procedures, as well as pre- and post-emergency procedures to mitigate impacts fire responses agencies due to an incident involving a BESS.

- **DR-27:** Provide a discussion of the proposed remote monitoring capabilities, such as dedicated incident command center, thermal infrared cameras, air/water sampling plans, to aid the incident commander, local first response agencies, etc. during an incident involving a BESS.

  Response: Monitoring capabilities are covered in Section 3.1 and Section 4 of the prepared Hazard Mitigation Analysis (Appendix C). Each SYL ESS enclosure is provided with an internal Fire

Alarm Control Panel (FACP), which will be monitored by the site Fire Command Center panel. Additionally, each SYL ESS enclosure is provided with a multilayer battery management system that monitors the state of all batteries and transmits signals directly to Supervisory Control and Data Acquisition (SCADA) or Energy Management System (EMS). Refer to SYL User Manual located in Appendix C of the Hazard Mitigation Analysis.

Data Request-28 and -29

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

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

  Response: A draft outline of the Fire Prevention Plan and a description of project-specific potential fire hazards, control procedures, and fire protections systems is provided below:

  Fire Prevention Plan Outline

  Objectives and Purpose of the Plan

  - References
  - Includes relevant OSHA Regulations (OSHA 29 CFR 1910.38 and OSHA 29 CFR 1910.39)

  Responsibilities

  - Establish responsibilities for both the Plant Manager (or Plant Manager Designee) and employees.
  - Building Information
  - General Description, service locations, potential hazard locations, fire detection and alarm system, fire suppression system, exits (locations and number of exits)

  Potential Hazards

  - Identify potential hazards throughout the Project site (Refer to Project-Specific Potential Fire Hazards section, below)

  Policies

  - General Requirements: Effective steps in preventing and minimizing fire risk
  - Fire Protection Rules: Rules for proper use of fire protection equipment
  - Impairment Procedures: Rules for any time a portion of the fire protection system becomes out of service
  - Training: When fire protection training is provided, to whom, and topics the training should include.
  - Site Specific Inspections and Maintenance: instructs users to create inspection program outlining each piece of fire protection equipment and instructs users to routinely inspect fire protection systems.

Project-Specific Potential Fire Hazards

As detailed in the *Enterprise Battery Energy Storage System Project Hazard Mitigation Analysis* (HMA; Coffman Engineers 2025), the following are project-specific potential fire hazards:

- Thermal runaway in a single Risen SYLSU3794U3794KC energy storage system (ESS) module or rack/unit
- Failure of battery or energy management system
- Failure of the emergency ventilation system
- Voltage surges on the primary electric supply
- Short circuits on the load side of the ESS
- Failure of the fire detection equipment system
- Failure of the fire alarm control panel

Control Procedures

The following control procedures specific to the Enterprise BESS Project are included as part of the Project's Emergency Response Plan (Coffman 2025, Section 4). Section 4 of the Emergency Response Plan discusses the Project's system controls and detection systems in case of a thermal runaway event, procedures when responding to a fire (for both fire fighters and non-fire fighters), the recommended suppression systems, procedures for a toxic gas release event, as well as discussing the fire protection system and explosion control.

Additional details on control procedures can be found in the Project's Emergency Response Plan (Appendix F).

Fire Protection Systems

As stated in the Project's Hazard Mitigation Analysis, the SYL ESS enclosures are not classified as "rooms" needing to contain automated sprinkler systems per CFC Section 1207.5.5. Despite not requiring in-unit fire suppression systems, the SYL ESS enclosures come preinstalled with a manual dry sprinkler system with fire department connection that will not be connected or used.

According to the Project's Emergency Response Plan, the SYL ESS enclosure fire protection systems include thermal runaway management, mechanical ventilation systems, automatic fire detection systems, gas detection systems, clean agent (Novec 1230 or FM-200) fire suppression, and interior fire sprinkler systems with FDC on ESS enclosure (factory installed but not used).

The SYL ESS enclosures will not have a dry chemical fire suppression. Additional details on control procedures can be found in the Project's Emergency Response Plan (Appendix F)and Hazard Mitigation Analysis (Appendix C).

- **DR-29:** Provide a complete description of the proposed training programs for the Fire Prevention Program and Emergency Response/Action Plan. Provide a discussion of proposed training provided to the operations personnel and the local first response agencies (fire department).

  Response: The proposed training plan for the Fire Prevention Plan and Emergency Response Plan will be provided to all employees at the time of initial hire and annually thereafter, by a designated safety representative. This designated safety representative will be tasked with updating the training each time a new hazard is introduced to the Project, or as site-specific conditions change. The proposed training plan will include, at a minimum:

- Contacts and their associated roles and responsibilities for all on-site and off-site safety personnel that either need to respond to an emergency situation or need to be made aware of an emergency situation
- Potential fire hazards on site
- Proper inspection, maintenance, and handling procedures for flammable, combustible, and otherwise hazardous materials and equipment (i.e., fire prevention housekeeping practices)
- Appropriate fire/emergency responses and documentation and/or necessary agency reporting
- Instructions on use of fire extinguishers as outlined within the Project's Emergency Response Plan
- How to recognize potential fire hazards
- Personal Protective Equipment: where to access it, when it is required, etc.
- How/where to access Emergency Response Plan and Fire Prevention Plan

Data Request-30

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

- **DR-30:** Provide a schematic and complete description of the emergency and standby power systems, including what they serve, by what means, and the duration of these systems for each required load (e.g., exhaust ventilation, gas detection systems, etc.).

  Response: A detailed description of battery container emergency and standby power systems is located in Section 3.1 of the Hazard Mitigation Analysis prepared by Coffman Engineers (Appendix C) and in the NFPA 69 Analysis Report Appendix E of the Hazardous Mitigation Analysis), which includes schematics.

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Appendix A

Site Security Plan

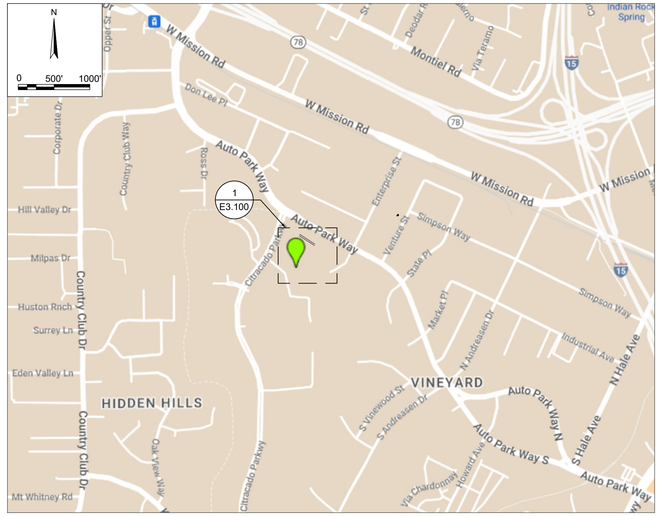
SITE VICINITY MAP (ENLARGED)

SCALE: 1" = 40' - 0"

1
E3.100

LEGEND

- EXISTING PARCEL BOUNDARY
- FACILITY BOUNDARY
- EXISTING OVERHEAD ELECTRICAL TRANSMISSION EASEMENT BOUNDARY
- EXISTING OVERHEAD ELECTRICAL TRANSMISSION
- NEW
- EXISTING
- FUTURE
- FENCE
- NEW GSU TAP-LINE
- ST — EXISTING UG STORM DRAIN LINE
- W — EXISTING UG WATER LINE
- NG — EXISTING UG NATURAL GAS LINE
- P — EXISTING UG ELECTRICAL LINE
- NEW RETAINING WALL



SITE VICINITY MAP

SCALE: 1" = 1000' - 0"

CONFIDENTIAL AND COMPETITIVELY SENSITIVE

EPC FIRM

ravenvolt
An ABM Company

LICENSED PROFESSIONAL ENGINEER
EDUARDO HIDALGO-REYES
E 24251
ELECTRICAL
STATE OF CALIFORNIA
10/24/2025

This document has been electronically signed and sealed by Eduardo Hidalgo-Reyes , PE on the date and time shown on the signature using a SHA authentication code. Printed copies of this document are not considered signed and sealed, and the SHA authentication code must be verified on any electronic copies.

PROJECT OWNER

MIDDLE RIVER POWER

SITE

ADDRESS:
201 ENTERPRISE ST
ESCONDIDO, CA 92029

COORDINATES:
33.121727, -117.117625

PROJECT

PROJECT NAME:
ENTERPRISE BESS PROJECT

SYSTEM SIZE:
52MWac, 1HR

GSU TAP-LINE VOLTAGE:
13.8 KV

ELECTRIC UTILITY:
SAN DIEGO GAS AND ELECTRIC (SDG & E)

AHJ:
CITY OF ESCONDIDO

RAVENVOLT PROJECT MANAGER:
EVAN WADE / DAVID BLACKMON

ELECTRICAL DRAWINGS SET

ISSUE: **90%**

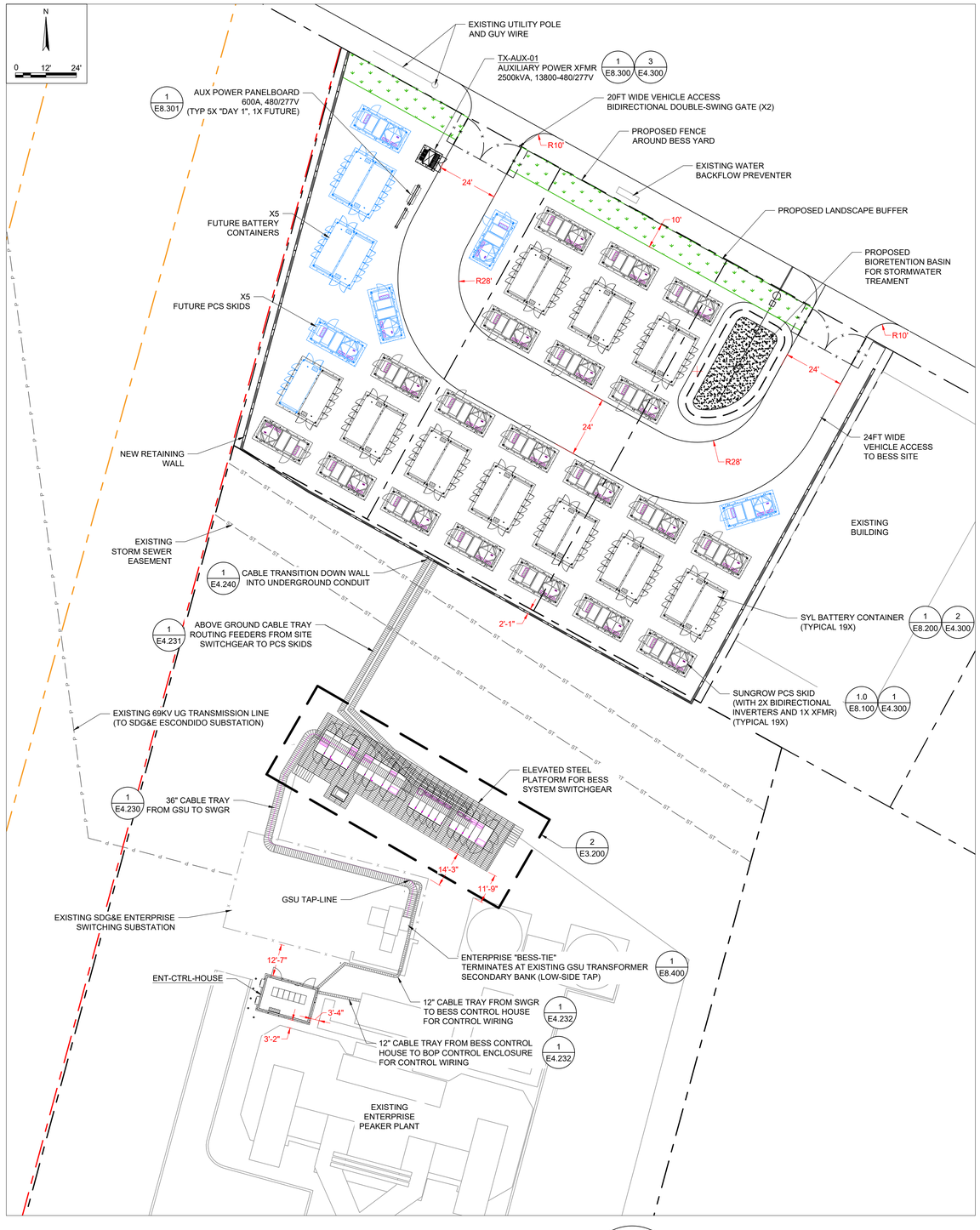
DESIGNED BY:	REVIEWED BY:
RAVENVOLT	----
DRAWN BY:	ASSISTED BY:
J. JAMES	----

REV	REVISION DESCRIPTION	DATE
1	90% SUBMISSION	10/24/25

SHEET TITLE
SITE VICINITY MAP

DRAWING NUMBER
E3.100

THIS DRAWING IS 24" X 36" AT FULL SIZE



SITE LAYOUT

SCALE: 1" = 24' - 0"

1 / E3.200

LEGEND

- EXISTING PARCEL BOUNDARY
- EXISTING OVERHEAD ELECTRICAL TRANSMISSION EASEMENT BOUNDARY
- EXISTING OVERHEAD ELECTRICAL TRANSMISSION
- NEW
- EXISTING
- FUTURE
- FENCE
- NEW GSU TAP-LINE
- EXISTING UG STORM DRAIN LINE
- EXISTING UG WATER LINE
- EXISTING UG NATURAL GAS LINE
- EXISTING UG ELECTRICAL LINE

GENERAL NOTES

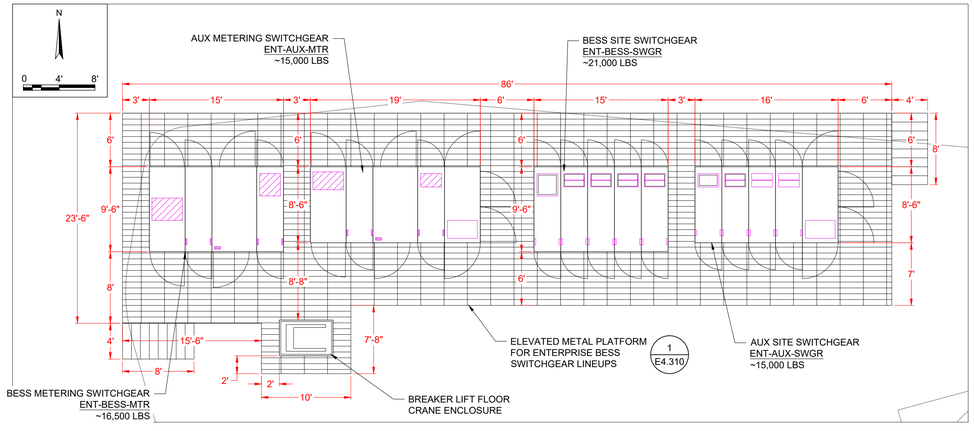
1. FOR MORE INFORMATION ON CIVIL SITE DESIGN, SEE KIMLEY-HORN CIVIL DRAWINGS.
2. FOR MORE INFORMATION ON STRUCTURAL FOUNDATION DESIGN, SEE KIMLEY-HORN STRUCTURAL DRAWINGS.
3. FOR MORE INFORMATION ON WALL DESIGN, SEE CONDON & JOHNSON STRUCTURAL DRAWINGS.

ENTERPRISE BESS-TIE

WHEN USED IN THIS DOCUMENT, THE TERM "BESS-TIE" SHALL DENOTE THE FOLLOWING:

THE 13.8kV ELECTRICAL CONDUCTOR CONNECTION BETWEEN THE NEW ENTERPRISE BESS "SITE SWITCHGEAR" AND THE EXISTING GENERATOR STEP-UP TRANSFORMER "GSU". THE BESS-TIE IS DIVIDED INTO 2 "LEGS". SEE DESCRIPTIONS BELOW.

LEG	AHJ	DESCRIPTION
1	CITY OF ESCONDIDO	FROM GSU XFMR SECONDARY BANK BUSBARS TO METERING SWITCHGEAR; CONDUCTOR IN CABLE TRAY
2	CITY OF ESCONDIDO	FROM METERING SWITCHGEAR TO ENTEPRISE BESS SITE SWITCHGEAR; CONDUCTOR IN CABLE TRAY



SWITCHGEAR PLATFORM

SCALE: 1" = 8' - 0"

2 / E3.200

DIMENSIONS

APPROXIMATE/ROUNDED MAJOR EQUIPMENT AND PAD DIMENSIONS SHOWN BELOW

SWITCHGEAR		
SITE METERING SWITCHGEAR		
ENT-BESS-MTR	14' x 9.5' x 9.5'	(LxWxH)
ENT-AUX-MTR	18' x 8.5' x 9.5'	(LxWxH)
SITE SWITCHGEAR		
ENT-BESS-SWGR	15' x 9.5' x 9.5'	(LxWxH)
ENT-AUX-SWGR	16' x 8.5' x 9.5'	(LxWxH)
SUNGROW PCS SKID [SC3450UD-MV-US]		
EQUIPMENT	19'-10" x 8' x 9.5'	(LxWxH)
PAD	21'-10" x 10'	(LxW)
SYL BATTERY CONTAINER [SU3794U3794KC]		
EQUIPMENT	19'-10" x 8' x 9.5'	(LxWxH)
PAD	21'-10" x 18.5'	(LxW)

CONFIDENTIAL AND COMPETITIVELY SENSITIVE

EPC FIRM

ravenvolt
An ABM Company

LICENSED PROFESSIONAL ENGINEER
EDUARDO HIDALGO-REYES
E 24251
ELECTRICAL
STATE OF CALIFORNIA

10/24/2025

This document has been electronically signed and sealed by Eduardo Hidalgo-Reyes , PE on the date and time shown on the signature using a SHA authentication code. Printed copies of this document are not considered signed and sealed, and the SHA authentication code must be verified on any electronic copies.

PROJECT OWNER

MIDDLE RIVER POWER

SITE

ADDRESS:
201 ENTERPRISE ST
ESCONDIDO, CA 92029

COORDINATES:
33.121727, -117.117625

PROJECT

PROJECT NAME:
ENTERPRISE BESS PROJECT

SYSTEM SIZE:
52MWac, 1HR

GSU TAP-LINE VOLTAGE:
13.8 KV

ELECTRIC UTILITY:
SAN DIEGO GAS AND ELECTRIC (SDG & E)

AHJ:
CITY OF ESCONDIDO

RAVENVOLT PROJECT MANAGER:
EVAN WADE / DAVID BLACKMON

ELECTRICAL DRAWINGS SET

ISSUE: **90%**

DESIGNED BY:	REVIEWED BY:
RAVENVOLT	----
DRAWN BY:	ASSISTED BY:
J. JAMES	----

REV	REVISION DESCRIPTION	DATE
1	90% SUBMISSION	10/24/25

SHEET TITLE
SITE LAYOUT

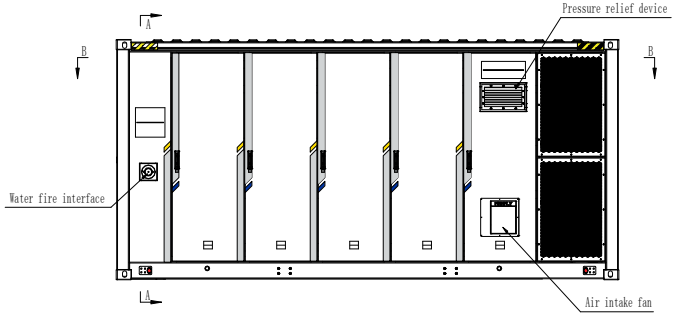
DRAWING NUMBER
E3.200

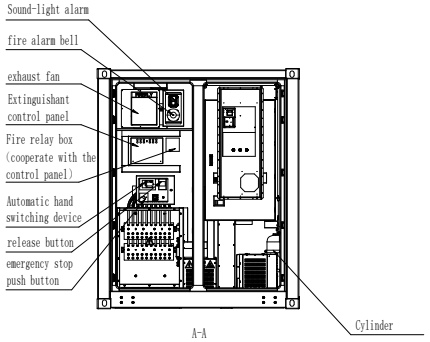
THIS DRAWING IS 24" X 36" AT FULL SIZE

PLOTTED/PUBLISHED BY: JONATHAN JAMES PLOT/PUBLISH DATE: 10/27/2025 1:41:18 PM DWG PLOTPATH: C:\Users\jonathan.james\Ravenvolt\Clients - Documents\MRP\T3 BESS - SITES\Escondido\1 - PDF SETS\CAD\WIP WORK\SITE - ENT - Rev2\ENT - SITE LAYOUT.dwg

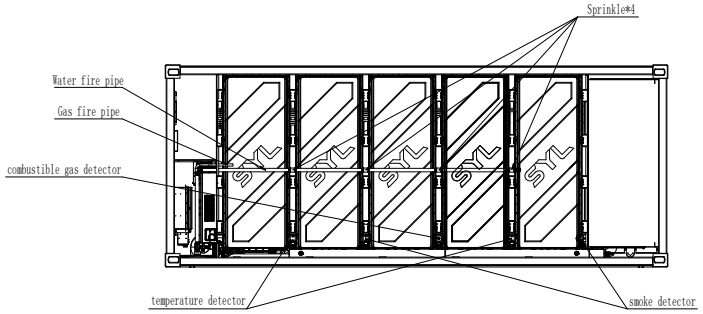
Appendix B

Battery Container Gas Detection System Schematic and Description





A-A



B-B

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Approved By		Date					

Combustible Gas Detection System Description

1. Design Basis

1. NFPA 855 Standard for the Installation of Stationary Energy Storage Systems
2. NFPA 69 Standard on Explosion Prevention Systems
3. NFPA 68 Standard on Explosion Protection by Deflagration Venting
4. Relevant drawings and design documents provided by the construction contractor

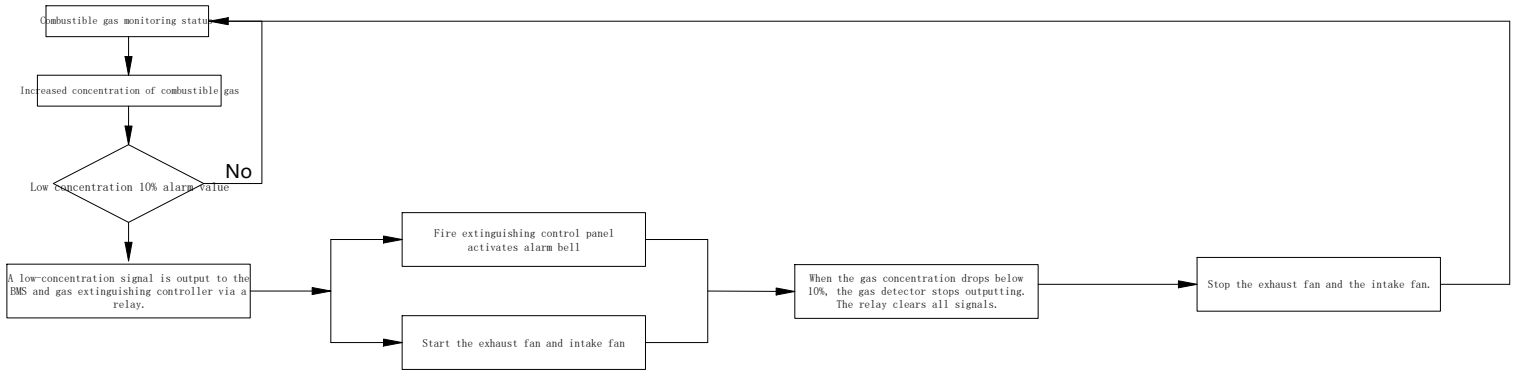
2. Design Description

Combustible Gas Detection System

The combustible gas detection system mainly includes combustible gas detectors and provides dry contact signal outputs. The specific configuration shall be determined in conjunction with local regulations and the specific requirements of the project. When the combustible gas concentration in the protected area reaches the low-level alarm setpoint, the detection system will be activated and will output a low-level alarm signal to the customer’s BMS and the gas fire suppression control panel.

The customer shall ensure that the ventilation fan is supplied with a normal 220 V power supply.

Combustible gas detection system flowchart



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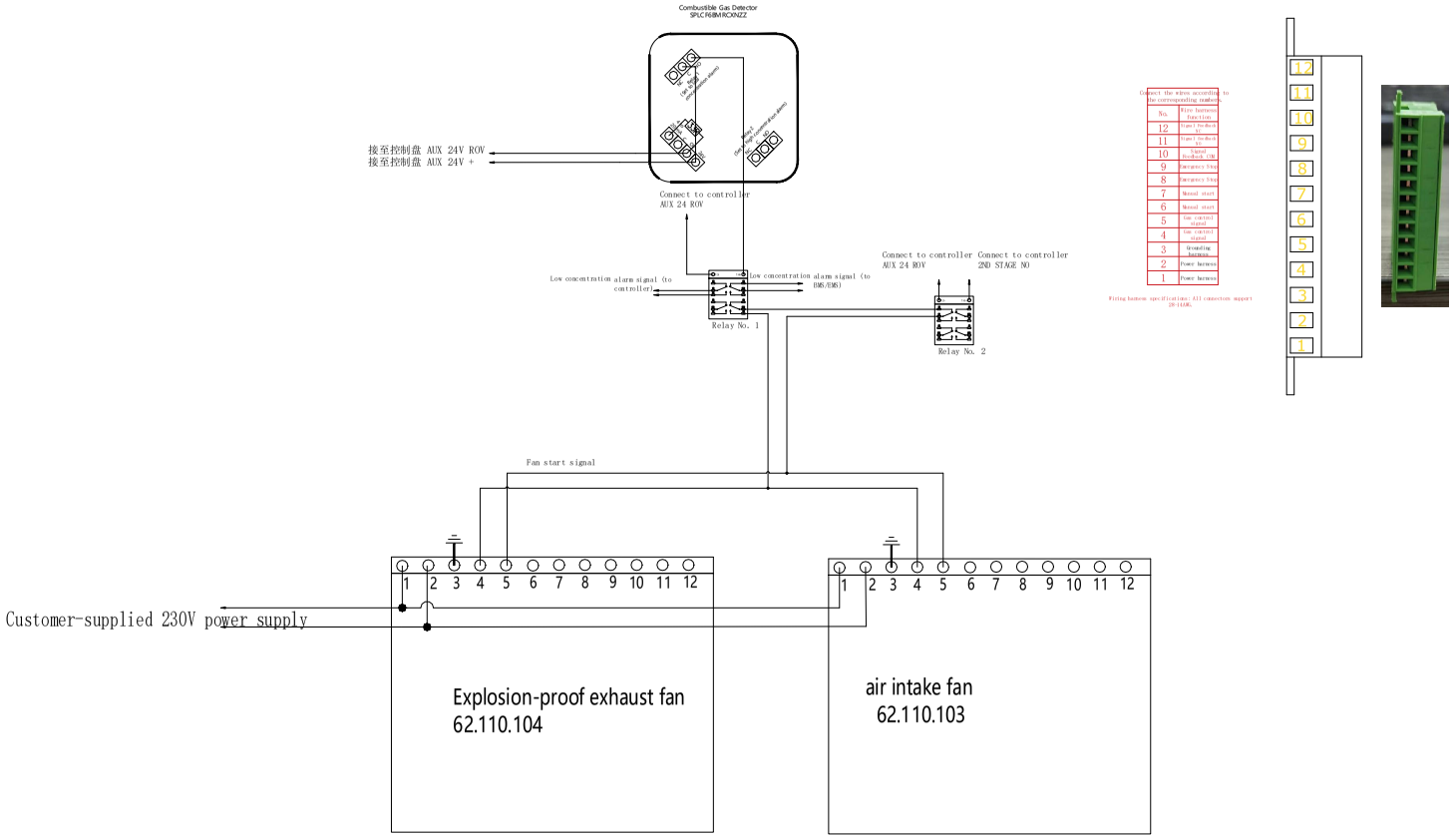

Wiring diagram of combustible gas system

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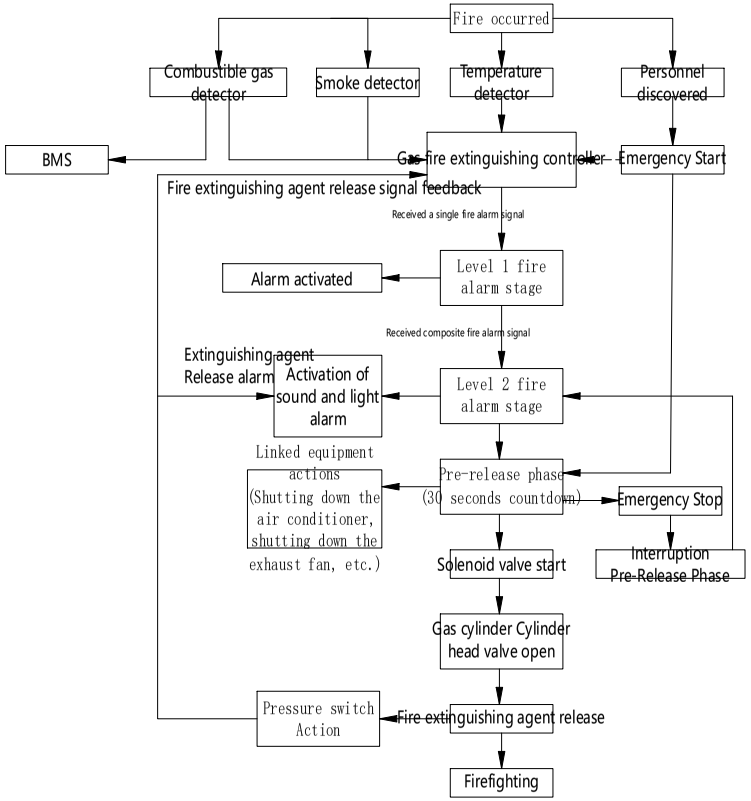
Fire extinguishing system extinguishing process diagram



Fire Alarm System Installation Description

1. The system is designed in accordance with NFPA 72, National Fire Alarm and Signaling Code.
2. This system adopts a wall-mounted integrated fire alarm control panel / gas fire suppression control panel. The fire alarm control panel / gas fire suppression control panel is wall-mounted in the control room to control on-site equipment. The panel is capable of displaying fire alarm signals, discharge (release) activation signals, and fault alarm signals.
3. Audible and visual alarm devices should be installed in locations that are easily seen and heard by personnel, so that occupants can evacuate promptly in the event of a fire alarm. The installation height shall be 2.5 m above the floor.
4. Emergency manual start/stop buttons shall be installed outside the protected area doors, at a height of 1.3–1.5 m above the floor, in conspicuous locations convenient for personnel operation.
5. Gas discharge indicator lights shall be installed outside the protected area, 0.2 m directly above the door.
6. Detectors should be installed horizontally. The installation height of heat detectors shall not exceed 8 m, and the installation height of smoke detectors shall not exceed 12 m. There shall be no obstructions within 0.5 m around the detector. The horizontal distance from the detector to walls or beam edges shall not be less than 0.5 m, and the horizontal distance to air-conditioning supply outlets shall not be less than 1.5 m.
7. The gas fire suppression control panel, fire alarm control panel, interlocking power supply, etc., shall be wall-mounted in the control room to control on-site equipment.
8. The gas fire suppression control panel shall be capable of feeding back fire alarm signals, discharge activation signals, and fault alarm signals to the fire alarm control panel.
9. Insulated conductors shall use 1 mm^2 multi-stranded twisted-pair copper flame-retardant wires.
10. All wiring shall be protected by metal conduits and preferably concealed within non-combustible structures. When surface-mounted, fire protection measures such as applying fire-resistant coating to the metal conduits shall be taken.
11. When there are relatively large openings in the protected area, fire shutters or similar devices that can automatically close before the discharge of the extinguishing agent shall be installed at such openings.
12. System installation and construction shall be carried out in accordance with the requirements of the Code for Construction and Acceptance of Automatic Fire Alarm Systems.

Operating Sequence Description

1. When any smoke detector **or** heat detector goes into alarm, the signal is transmitted to the fire suppression control panel, and the alarm bell is activated.
2. When any one smoke detector **and** any one heat detector alarm simultaneously, the signals are transmitted to the fire suppression control panel. The alarm bell and audible/visual alarms are activated, and the control panel starts a 30-second countdown. Upon completion of the countdown, the gas fire suppression system is activated and agent discharge begins.
3. When the combustible gas detector alarms, the signal is transmitted to the fire suppression control panel. The alarm bell is activated, and the supply and exhaust ventilation systems are activated.
4. When any smoke detector, heat detector, or combustible gas detector experiences a fault, the signal is transmitted to the fire suppression control panel, and the fault relay is activated.

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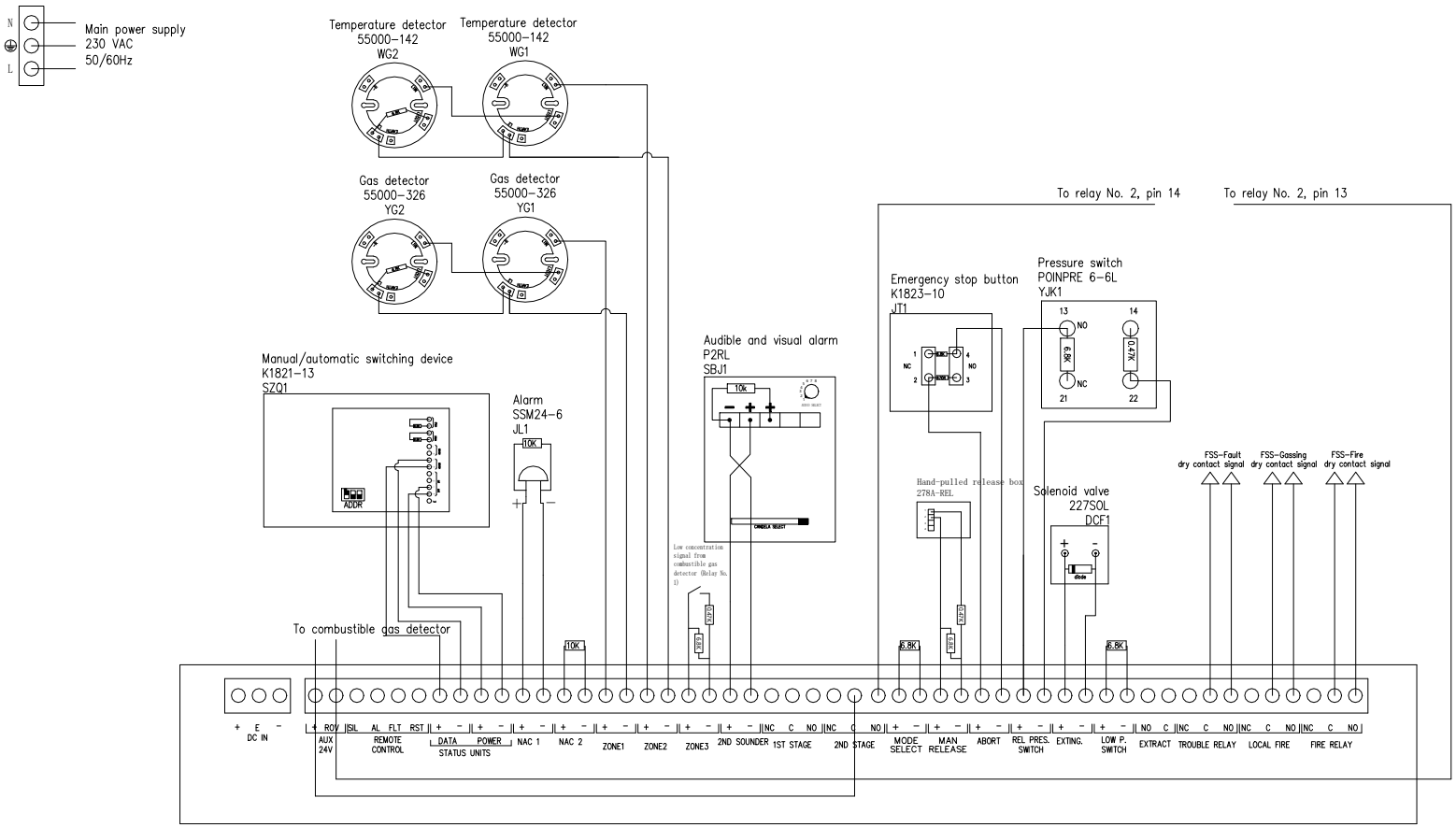

Fire Control Panel (Gas fire extinguishing controller)

SIGMA A-XT

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