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March 27, 2026

Jon Boyer
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Escondido, CA 92029

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

Dear Jon Boyer:

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

This Data Request seeks further information in the area of Air Quality based on the contents of the petition to amend.

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

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

Joseph Douglas

Joseph Douglas
Compliance Project Manager

Enclosure: Data Requests:

TECHNICAL AREA

AIR QUALITY GREENHOUSE GASES, AND PUBLIC HEALTH

Author: Gerry Bemis, Andres Perez, Winston Potts

BACKGROUND: BESS THERMAL RUNAWAY/FIRE IMPACTS

In response to DR-11 (TN 268067), the applicant provided a hazard consequence analysis (HCA) that included the results of a UL 9540A fire test analysis (TN 268071). UL 9540A outlines procedures to test battery energy storage systems for fire safety and thermal runaway propagation. These procedures include testing of thermal runaway at different scales, from single cell- to installation-level testing.

The HCA contained the results of cell-, module-, and unit-level UL 9540A fire testing, with Attachment F (Cell Gas Analysis Report) showing an analysis of the composition of vented gas for the cell-level fire testing. The major gas components from the report are Hydrogen (41.313%), Carbon Dioxide (27.205%). Carbon Monoxide (13.453%), Methane (7.403%), Ethylene (4.408%), Propylene (1.297%), Ethane (1.235), and others (lower than 1%).

However, a review of the literature indicates that other toxic air contaminants (TACs), such as benzene, particulate matter (including ultrafine particulates), hydrogen chloride, hydrogen fluoride, and hydrogen cyanide, acrolein, formaldehyde, VOCs (toluene, etc.), sulfur dioxide, nitrogen dioxide, phosphoryl fluoride, carbonyl fluoride could also be released, even though they are not available from the cell/module level UL 9540A test report.

In addition, the project owner's offsite consequence analysis in the HCA assumed that only 6 cells would fail during a potential BESS thermal runaway/fire event, stating that a failure of 3 cells would be categorized as a "credible event" and that applying a safety factor of 2 would be sufficient to capture the risk of a thermal runaway/fire event. However, a worst-case fire could involve a whole BESS unit. Staff needs additional analysis of the worst-case impacts during a potential BESS thermal runaway/fire event.

DATA REQUESTS

1. 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), including the TACs in Attachment F: Cell Gas Analysis Report, TN 268071) and those mentioned above using available representative data from the literature review or measured from any BESS test.
2. If the modeling data originate from literature review, please provide a copy of the referenced literature. If the modeling data come from a BESS test, please also provide the specific analytical method(s) for determining the presence of off-gassing constituents in the test, 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.

3. Please identify the assumed worst-case scenario, including but not limited to the number of cells or modules involved, state of charge, burn duration, and emission factors. Please provide justification demonstrating that the assumptions are both representative and conservative to be protective of public health.
4. Please compare the modeled TACs concentrations to appropriate health-based exposure thresholds, including the U.S. EPA Acute Exposure Guideline Levels (AEGLs), the OEHHA/CARB acute Reference Exposure Levels (RELs), and Emergency Response Planning Guidelines (ERPGs) thresholds but excluding the Immediately Dangerous to Life or Health (IDLH) levels since they are not health protective.
5. Please demonstrate whether the acute Hazard Index (HI) of TACs would be higher than the significance threshold of 1.0 at sensitive receptors. Please demonstrate whether the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards. If the acute HI would exceed 1.0 or the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards, please explain what mitigation measures are planned to be implemented to reduce the impacts to less than significant.

BACKGROUND: BESS CONSTRUCTION AND OPERATIONS

The PTA (TN 262237) states that the BESS would not be recharged from the Enterprise Emergency Peaker Project (EEPP) and only from the SDG&E grid, as stated on pages 5, 6 and 9 and Appendix A-4 of the PTA and Appendix C, page 5. The PTA also states that both the BESS and EEPP could be operational at the same time during ramping periods as the site changes from one to the other, but that the transmission interconnection would not exceed the allowed 52 MW at the point of interconnection (POI), as described in PTA on pages 1 and 2 and in Appendix A on page A-5. The PTA states that hourly and annual emissions from EEPP would not increase, as stated in the PTA on page 5. Staff needs additional information to fully understand how the operation of the BESS would affect operation of EEPP.

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6. The PTA states on page 9 and in Appendix C on page C-6 and elsewhere that construction would begin in Q4 of 2025 and commercial operation would begin in Q4 of 2026. Please provide an updated construction and operation schedule. It is not necessary to recompute construction emissions as long as they do not increase.

7. An electric vehicle is typically operated to maintain the state of charge of its battery at between 20% and 80% of its full charge, to maximize its battery life. Battery degradation is expected as stated in the PTA, for example on page 6. DR-9 in TN 268067 says the analysis of BESS operations is based on assuming the batteries charge 4 hours per day for a total of 75,920 MWh per year. Describe the expected range of the state of charge of the BESS during operations, the cost of recharging the BESS (say, in cents/kWh), the hours of the day when it would be recharged and the cost of electricity provided to the grid by the BESS (say, in cents/kWh) after considering charge/discharge efficiency.
8. Compare the cost of operating the BESS (say, in cents/kWh) versus the cost of operating EEPP (say, in cents/kWh). Assuming that the cost of operating EEPP is greater than the BESS, explain when and why the EEPP would operate. If the cost of operating the BESS exceeds the cost of operating EEPP, explain the need for the BESS. Compare annual emissions of EEPP before and after installation of the BESS.
9. Appendix C of TN 262237 says on pages 33 and 36 that the BESS project would be required to comply with SDAPCD's Permit to Operate (PTO). Has the project owner submitted an application to the SDAPCD? What is the status of any analysis conducted by the SDAPCD? If the SDAPCD has completed an analysis and issued a PTO for the BESS, please provide a copy.

BACKGROUND: BACKUP EMERGENCY GENERATORS

If any emergency backup generator is planned for use, it would be regulated under San Diego Air Pollution Control District (SDAPCD) permitting regulations, which require emissions to be at levels that would not expose sensitive receptors to a substantial health risk. 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 project owner 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) if proposed as part of the project.

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10. If any emergency diesel generator is planned for use, what other technologies or fuel alternatives to diesel for the backup generators would be explored and why would they not be pursued?
11. Would the project owner explore 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?

ENTERPRISE EMERGENCY PEAKER PROJECT (01-EP-10C)
DATA REQUESTS-SET 2

BACKGROUND: ANNUAL PROJECT EMISSIONS

In the Air Quality and Greenhouse Gas Study (Appendix C, TN #262237), Table 8 estimates total annual project emissions to be 109 $MTCO_2e$. On page 39, the project construction (amortized) emissions plus annual operation are listed as 272 $MTCO_2e$ per year.

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12. Please explain the difference between these numbers.