

DOCKETED	
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Project Title:	Amendment to Definition of Related Facility
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*Comment Received From: BHE Renewables, LLC.
Submitted On: 5/1/2026
Docket Number: 25-RULE-01*

**BHE Renewables, LLC Comments on Proposed Action--
Amendments to the Definition of Appurtenant Facility and Related
Facility**

Additional submitted attachment is included below.



BHE Renewables, LLC.
4124 NW Urbandale Drive
Urbandale, IA 50322

May 5, 2026

Barbara Borkowski
Chief Counsel's Office
California Energy Commission Docket Unit
715 P Street, MS-4
Sacramento, CA 95814

**RE: Docket Number 25-RULE-01
BHE Renewables, LLC. Comments on Notice of Proposed Action--Amendments to
the Definition of Appurtenant Facility and Related Facility**

Dear Ms. Borkowski:

BHE Renewables, LLC (BHER) thanks the California Energy Commission (CEC) for the opportunity to provide comments on the proposed amendments to the definitions of "appurtenant facility" and "related facility" in in the California Code of Regulations (CCR), Title 20, Article 2.

BHER participated in the related October 9, 2025 workshop, submitted comments on initial language proposed by CEC Staff, and appreciates that the Express Terms reflects stakeholder comments. The resulting definitions provide greater clarity than the language initially proposed for consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon Trujillo".

Jon Trujillo
General Manager, Geothermal Development