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Revision 2 Part 1 Data Requests for Perkins Renewable Energy Project (24-OPT-01)

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 sections 25445 et seq.

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.

The applicant filed responses to Staff Data Requests in the docket on April 22, 2026 (TNs 269550 and 269551), May 7, 2026 (TN 269875- confidential files) and on May 27, 2026 (TN 270303). Staff has the following requests for data on the application for the Perkins Renewable Energy Project. CEC staff anticipates filing data requests for biological resources in a Part 2 submittal.

TRAFFIC AND TRANSPORTATION

The response to DR TRANS-2 in TN 257953 states "For many projects, a qualitative analysis of construction traffic may be appropriate." (CEQA Guidelines Section 15064.3). Vehicle miles traveled (VMT) can and should be estimated for construction traffic. The CEQA guidelines are not specific on whether to include or exclude construction traffic, and the issue has not been specifically cited in any legal opinions. In the State's April 2018 VMT Guidelines: "GHGs can be further reduced at the project level through implementing energy-efficient construction and travel demand management approaches." This suggests that construction-related VMT is of interest to the State. Given that the traffic generation from the project is mostly during the construction phase, it seems relevant to examine the VMT during construction.

Section 15064.3, subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Here, the term 'automobile' refers to on-road passenger vehicles, specifically cars and light trucks." Based upon the above considerations, a VMT analysis of worker trips to/from the site during the construction phase is appropriate.

Below is an example of a VMT analysis for this type of project (excerpted from Potentia-Viridi Battery Energy Storage System Staff Assessment, 24-OPT-04, TN 268314):

Vehicle-trip generation (for workers) as a result of project construction is summarized in Table 5.14-4. The project workforce is expected to be within a 26-mile radius of the project site. To estimate the worker VMT for the construction phase of the project, daily

worker trips and trip lengths were multiplied for each phase of the project to estimate worker VMT for the duration of each phase. The total worker VMT (Table 5.14-4) was then normalized over the 25-year project life, which was estimated as 9,100 days. The daily VMT per worker was estimated by dividing the daily worker VMT by the average number of daily workers. As shown in Table 5.14-5, the project's daily VMT per worker is estimated to be 4.6. According to the Alameda CTC model the existing regional VMT per employee for Alameda County is 15.0. The significance threshold is 85 percent of the existing regional VMT or 15 percent below the existing regional VMT, hence 12.8 VMT per employee. Therefore, the normalized daily VMT per worker of 5.4 VMT per worker estimated for the project's construction is below the regional threshold of VMT per employee (12.8). Therefore, the construction phase of the project would result in a less than significant VMT impact.

Therefore, the construction of the proposed project would not conflict or be inconsistent with CEQA Guidelines Sections 15064.3(b)(1), and transportation impacts would be less than significant.

TABLE 5.14-4 TOTAL WORKER VMT DURING CONSTRUCTION PHASE

Phase	Worker Trips per Day (2 trips/worker)	Average Miles per Trip	Duration (days)	VMT per Phase
Site Preparation	50	26	40	52,000
Civil Work and Grading	110	26	120	343,200
Foundations and Underground Equipment	100	26	80	208,000
BESS Equipment Installation	160	26	100	416,000
Project Substation Installation	40	26	160	166,400
Gen-Tie Foundations and Structure Erection	28	26	40	29,120
Gen-Tie Line Stringing and Pulling	24	26	10	6,240
Testing and Commissioning	52	26	110	148,720
PG&E Interconnection Facility Upgrades with Tesla Substation	40	26	130	135,200
Decommissioning	40	26	150	156,000
TOTAL				1,660,880

TABLE 5.14-5 DAILY AVERAGE WORKER VMT DURING CONSTRUCTION

Item	Amount
Worker VMT during Construction (from Table 5.14-5)	1,660,880
Project Life (35 years, expressed in days)	9,100
Daily Worker VMT (total divided by number of days)	183
Average Daily Number of Workers over Life of Construction	34
Average VMT per Worker (daily VMT divided by number of workers)	5.4
Alameda County average VMT/Employee (from ACTC travel model)	15.0
Threshold of Significance (15% below County average)	12.8

REV 2 DR TRANS-1. Please estimate the construction VMT using the State guidelines as per the example provided above.

Attachment J.2 "VMT Memo" in TN 257952 states "It is assumed operational workers would either be located in, or seek permanent residence within, a reasonable commute distance. For example, El Centro is approximately 27 miles west of the Project Site and Yuma is a slightly further (40 miles)…"

REV 2 DR TRANS-2. Please explain the source for determining that permanent workers would live in El Centro or Yuma.

Attachment J.2 "VMT Memo" in TN 257952 states that "The estimated commute time and VMT for operational workers is considered to be within a reasonable range typical of the remote desert communities nearest to the Project."

Note that VMT is not an absolute measure, but a measure of efficiency per capita. Therefore, an 80-mile round-trip for workers could result in a VMT per capita that exceeds the County average.

REV 2 DR TRANS-3. Please explain the source for determining that VMT for operational workers is considered to be within a reasonable range typical of the remote desert communities nearest to the project.

WORKER SAFETY

Staff reviewed the response to REV1 DR WS-3, Attachment A.1 Air Quality Technical Report and Attachment D Revised Opt-in Application Project Description (TN 269551) and have the further questions. The Air Quality Technical Report and the associated air quality and greenhouse gas emissions analyses assume the selected battery is Tesla Megapack 2XL, however, the Revised Project Description states "The Project could use any commercially available battery technology, including but not limited to lithium ion, LFP (lithium iron phosphate), NMC (nickel manganese cobalt), or NCA (nickel cobalt aluminum) batteries."

REV 2 DR WS-1. Please provide the battery manufacturer and model proposed for the project. Furthermore, please provide documentation of UL 9540A testing for the selected battery.

Attachment D Revised Opt-in Application Project Description (TN 269551) lacks a detailed BESS site plan.

REV 2 DR WS-2. Provide a detailed project site plan of the BESS facility including setback distances, road width dimensions, location of water tanks, and any other structures/equipment relevant to fire protection and suppression.

Table 2.8-1 of Attachment D Revised Opt-in Application Project Description (TN 269551) notes that Fire Management and Prevention Plan, Hazardous Materials Management &

Oil Spill Response Plan, and Health, Safety and Noise Plans have been prepared. Please provide completed plans that are relevant to Worker Safety and Fire Protection.

REV 2 DR WS-3. Provide the Fire Management and Prevention Plan, Hazardous Materials Management & Oil Spill Response Plan, and Health, Safety and Noise Plan that have been prepared.