

DOCKETED	
Docket Number:	26-OPT-02
Project Title:	Seahawk Battery Energy Storage System
TN #:	271321
Document Title:	Determination of Incomplete Application and Request for Information for the Seahawk Battery Energy Storage System (26-OPT-02)
Description:	N/A
Filer:	Marichka Haws
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	7/8/2026 1:10:13 PM
Docketed Date:	7/8/2026



July 8, 2026

Andrew Reed
Executive VP, Project Development
Sequoia Energy Storage 1, LLC
c/o New Leaf Energy, Inc.
55 Technology Drive, Suite 102
Lowell, Massachusetts 01851

**Determination of Incomplete Application and Request for Information for the
Seahawk Battery Energy Storage System (26-OPT-02)**

Dear Andrew Reed:

California Energy Commission (CEC) staff confirmed receipt on June 8, 2026, of an Opt-In Application for the Seahawk Battery Energy Storage System (BESS) (26-OPT-02). Sequoia Energy Storage 1, LLC (applicant), a subsidiary of New Leaf Energy, Inc., proposes to construct, own, and operate the 200-megawatt (MW) (800 MW-hour) Seahawk BESS project. The project would be on approximately 16 acres within a portion of Assessor Parcel Number (APN) 051-101-77 and 051-101-78, approximately one mile north of the city of Watsonville and east of the intersection of Minto Road and Green Valley Road.

The primary components of the proposed project include the BESS facility, an operations and maintenance (O&M) building, a project substation, a 115-kilovolt (kV) interconnection transmission (gen-tie) line, and interconnection facilities. The project would be composed of lithium-iron phosphate, or similar technology batteries. The proposed project would provide a service to the regional electric grid by receiving and storing electrical energy (charging) from the Pacific Gas and Electric Company (PG&E) electric transmission system, and then later delivering energy (discharging) back to the PG&E Green Valley Substation when the stored energy is needed.

The proposed project would be interconnected to the regional electrical transmission grid via an approximately 0.21-mile-long new single-circuit 115-kV gen-tie line within an expected 2.5-foot-wide trench between the project substation and the existing Green Valley Substation. The gen-tie line would extend west from the site perimeter (underground), crossing Minto Road, and then continue parallel to the existing Minto Road right-of-way, then route northwest and continue parallel to the boundary of the Green Valley Substation until turning east to reach the point of interconnection (POI) at Green Valley Substation. The applicant would construct and own the portion of the gen-

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tie line between the project substation and the point of change of ownership (POCO), an overhead riser pole. PG&E would construct and own the remaining portion (overhead) of the gen-tie from the POCO to the POI within the Green Valley Substation.

CEC staff has completed its review of the project application pursuant to California Code of Regulations, title 20, section 1877, which specifies the required contents of an Opt-In application and Public Resources Code, section 25545.4(a), which states, "within 30 days of the submission of the application, the commission shall review the application and make a determination of completeness." Based on this review, CEC staff has determined the submitted application is incomplete.

Pursuant to Public Resources Code, section 25545.4(b), CEC staff requires the information described in the attachments to this letter be submitted. The attachments consist of: (1) data completeness worksheets listing the requirements specified in statute and regulation; and (2) requests for additional information (data requests) needed for staff to complete its environmental and other analyses of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to review Opt-In applications.

CEC staff's review of the application has identified several topics with data requests which are described in detail in Attachment B. As an example, staff requires additional details related to biological resources, including possible nitrogen deposition modeling for backup diesel generators, along with an assessment of potential habitat impacts from BESS-related fire impacts; air dispersion modeling to quantify the pollutant concentrations during construction and design of project elements with a potential impact on waters of significance; complete descriptions of the project transmission and interconnection facilities; and additional details on water supply and stormwater control measures, socioeconomic impacts of the project and the project's compliance with setbacks, allowable heights, and use restrictions. Staff also require additional details for the project's proposed fire prevention, extinguishing, emergency response times, and suppression systems (including water supply), and operational elements to verify that the proposed project features are adequate to mitigate adverse impacts to operations personnel, emergency first responders, and the public.

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.

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.

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Consistent with Public Resources Code, section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, accompanied by a statement from the applicant that its response to this request for information is now complete and addresses all identified deficiencies, CEC staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter. Any further requests by CEC staff for missing information in response to additional information provided by the applicant will be made within 45 days, or as soon as practicable thereafter, of receipt of that information (Pub. Resources Code, § 25545.4(b)(1)).

If you have any questions about the information identified as necessary to complete the application, please email the CEQA project manager, Eric Veerkamp, at Eric.Veerkamp@energy.ca.gov.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Drew Bohan', with a stylized, sweeping underline.

Drew Bohan
Executive Director

Attachments

Attachment A: Data Completeness Worksheets for California Code of Regulations, Title 20, section 1877
Attachment B: Data Requests

Seahawk Battery Energy Storage System (26-OPT-02) Completeness Review

Incomplete

1. Mandatory Opt-In Requirements
2. Air Quality (includes Greenhouse Gases)
3. Alternatives
4. Biological Resources
5. Cultural/Tribal Cultural Resources
6. Executive Summary
7. Geologic Hazards
8. Hazardous Materials Handling
9. Land Use, Agriculture, and Forestry
10. Noise and Vibration
11. Project Description
12. Paleontological Resources
13. Public Health
14. Socioeconomics
15. Soils (see Geologic Hazards)
16. Transportation
17. Transmission System Design
18. Water Resources
19. Worker Safety and Fire Protection

Complete

1. Efficiency, Energy, and Energy Resources
2. Facility Design
3. Reliability
4. Transmission System Safety and Nuisance
5. Visual Resources
6. Waste Management
7. Wildfire

Attachment A

Data Completeness Worksheets
for Title 20, section 1877

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X** Revision No. 0 Date: 07/8/2026
 Technical Area: **Mandatory Opt-In Requirements** Project: Seahawk BESS Technical Staff: Ellen L., Jeanine H., Nick K., Ardalan S.
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K., Kaycee C., Eric V., Wenjun, Crystal

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
AUTHORITY AND VERIFICATION				
Cal. Code Regs., tit. 20 § 1707	Every notice and application shall be dated and signed by the applicant attesting under penalty of perjury to its truth and accuracy.	TN 270251 Appendix 1B	Yes	
"FACILITY" OR "DISCRETIONARY PROJECT" DEFINITION MET				
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)	Explanation of how the facility meets one or more of the definitions of "facility":	TN 270250 Section 1 (1.6)	Yes	
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)(4)	If the opt-in application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application shall contain a detailed description of how the facility meets the criteria specified in section 25545(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technologies.	N/A	N/A	N/A
REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE				

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: 07/8/2026

Technical Area: **Mandatory Opt-In Requirements**

Project: Seahawk BESS

Technical Staff: Ellen L., Jeanine H., Nick K., Ardalan S.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K., Kaycee C., Eric V., Wenjun, Crystal

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.	TN 270250 Section 1.6.3, TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	--	--	--
Pub. Resources Code, § 25545.3.3(a)	The entirety of the construction of the covered project is a public work.	--	--	--
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following apply:	TN 270251 Appendix 1C, TN 270250 Section 1.6.3	Yes	
Pub. Resources Code, § 25545.3.3(b)(1)	Applicant ensures that the prevailing wage requirement is included in all contracts for the performance of all construction work.	TN 270251 Appendix 1C	Yes	

DATA COMPLETENESS WORKSHEET

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 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ellen L., Jeanine H., Nick K., Ardan S.
 Technical Senior: Eric K., Kaycee C., Eric V., Wenjun, Crystal

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(2)	Contractors and subcontractors must pay all construction workers employed in the construction of the project at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(3)	Contractors and subcontractors performing construction work on the project shall employ apprentices at no less than the ratio required in the Labor Code section 1777.5.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(4)	Except as provided in (b)(6), all contractors and subcontractors performing construction work shall maintain and verify payroll records pursuant the Labor Code section 1776, make those records available for inspection and copying, and furnish those payroll records to the Labor Commissioner pursuant to the Labor Code section 1771.4.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	TN 270251 Appendix 1C	Yes	

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	--	--	--
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	TN 270251 Appendix 1C	Yes	

DATA COMPLETENESS WORKSHEET

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Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K., Kaycee C., Eric V., Wenjun, Crystal

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	--	--	--
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	TN 270251 Appendix 1C	Yes	

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	--	--	--
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	TN 270251 Appendix 1C	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	TN 270251 Appendix 1C	Yes	

PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)

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Project: Seahawk BESS

Technical Staff: Ellen L., Jeanine H., Nick K., Ardalan S.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K., Kaycee C., Eric V., Wenjun, Crystal

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	Section 1.6 (1.6.4), TN 270250	Yes	
IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA				
Cal. Code Regs., tit. 20, § 1877(e)	Identify whether the project is, on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	TN 270250, Section 1.6.5	Yes	
LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT				
Cal. Code Regs., tit. 2, § 1877(g); Pub. Resources Code § 25545.10	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations prior to project certification, consistent with Public Resources Code section 25545.10.	Section 1.6.6, TN 270250, Appendix 1D, TN 270251	No	See DR MAND-1

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Project Manager: Eric Veerkamp

Docket: 26-OPT-02

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS				
Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.	Section 1.6 (1.6.7), TN 270250	Yes	
Pub. Resources Code § 21183(a)	The project will result in a minimum investment of \$100,000,000 in California upon completion.	Section 3.10, TN 270248	Yes	
Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	Section 1.6.7, TN 270250	Yes	
Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.	Section 1.6.7, TN 270250	Yes	

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OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	TN270249 Section 3.14	Yes	
Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.	Section 1.6.7, TN 270250	Yes	
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...	Section 1.6.7, TN 270250	Yes	
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...	Section 1.6.7, TN 270250	Yes	

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 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K., Kaycee C., Eric V., Wenjun, Crystal

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.	Section 1.6.7, TN 270250	Yes	
Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 21180(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	--	--	--
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	Section 1.6.7, and Section 3.1, TN 270250	Yes	
Pub. Resources Code § 21183.6(a)(2)	Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority: 1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to,	Section 1.6.6, Section 3.1, TN 270250	Yes	Cross reference to DR GHG-1, 2, 3, 4 for details to ensure appropriate mitigation.

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 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K., Kaycee C., Eric V., Wenjun, Crystal

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	energy efficiency, installation of renewable energy electricity generation, and reductions in vehicle miles traveled. 2. The remaining unmitigated impacts shall be mitigated by direct emissions reductions that also reduce emissions of criteria air pollutants or toxic air contaminants within the same air pollution control district or air quality management district in which the project is located. 3. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate within the same air pollution control district or air quality management district in which the project is located. The offsets shall be undertaken in a manner consistent with the Health and Safety Code section 38500, including, but not limited to, the requirement that the offsets be real, permanent, quantifiable, verifiable, and enforceable, and shall be undertaken from sources in the community in which the project is located or in adjacent communities. 4. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate from sources that provide			

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	a specific, quantifiable, and direct environmental and public health benefit to the region in which the project is located.			
Pub. Resources Code § 25545.19	For an application for an energy storage system, documentation of consultation with the authority that has jurisdiction over fire suppression in the area where the energy storage system is proposed. Consultation shall have occurred at least 30 days before submitting the application. Documentation shall include the date, the names and titles of participants, a summary of matters discussed, and a description of how the application addresses those matters. If the authority with jurisdiction has declined the opportunity to meet or has not responded within 30 days, documentation includes these interactions.	TN270249 Section 3.17.2	No	See DR MAND-2, with cross reference to DR WS-14

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **X**
 Technical Area: **Air Quality** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Andres Perez
 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270250, Section 3.1, Subsection 5	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270250, Section 3.1, Subsection 2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	TN 270250, Section 3.1, Subsection 9	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as	TN 270250, Section 3.1, Subsection 5	No	See DRs GHG-5 through 8 and DRs AQ-1 through 3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
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 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	N/A	N/A	N/A
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	N/A	N/A	N/A
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	TN 270250, Section 3.1, Subsection 5	Yes	
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	TN 270250, Section 3.1, Subsection 1.2	No	See DRs GHG-1 through 4
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO ₂ , CH ₄ , N ₂ O, and SF ₆) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	TN 270250, Section 3.1, Subsection 5	No	See DRs GHG-1 through 6

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Air Quality** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Andres Perez
 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	TN 270250, Section 3.1, Subsection 5	Yes	
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	TN 270250, Section 3.1, Subsection 5; Section 3.1	Yes	
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	TN 270250, Section 3.1, Subsection 2.3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **X**
 Technical Area: **Air Quality** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Andres Perez
 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Modeling file "745058_2015-2019_AdjU.sfc" submitted directly to staff	Yes	
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	N/A	N/A	N/A
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Modeling file "745058_2015-2019_AdjU.sfc" submitted directly to staff	Yes	
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:	--	--	--
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant,	TN 270250, Section 3.1, Subsection 5	No	See DR AQ-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **X**
 Technical Area: **Air Quality** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Andres Perez
 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM ₁₀) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO _x), sulfur dioxide (SO ₂), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM ₁₀) and particulate matter less than 2.5 microns in diameter (PM _{2.5}) from construction-related equipment;			
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5}) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;	TN 270250, Section 3.1, Subsection 5	Yes	

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Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Air Quality Project: Seahawk BESS Technical Staff: Andres Perez
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	TN 270250, Section 3.1, Subsection 6	Yes	
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5} .	N/A	N/A	N/A
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide the following information:	--	--	--
Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	N/A	N/A	N/A

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Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: **Air Quality** Project: Seahawk BESS Technical Staff: Andres Perez
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	N/A	N/A	N/A
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	TN 270250, Section 3.1, Subsection 5	No	See DR AQ-2
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270250, Section 3.1, Subsection 3	No	See DR AQ-3
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the	TN 270250, Section 3.1, Subsections 7 and 8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: **Air Quality** Project: Seahawk BESS Technical Staff: Andres Perez
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Q.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270250, Section 3.1, Subsection 7	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270250, Section 3.1, Subsection 8; Section 1, Subsection 1.6.4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X**

Revision No. _____ Date: 7/8/2026

Technical Area: **Alternatives** Project: Seahawk BESS

Technical Staff: Tatiana Inouye, Irene Kaufman

Project Manager: Eric Veerkamp Docket: 26-OPT-02

Technical Senior: Negar Vahidi

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.	TN 270249 Subsection 4.2.1; Subsection 4.5.1; Appendix 2E: Large Generator Interconnection Agreement (Confidential Filing), TN 269966	No	See DR ALT-1
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).	TN 270249 Subsection 4.7; Subsection 4.8	No	See DR ALT-2 and DR ALT-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	TN 270250 Section 3.2.1 and 3.2.2	No	See DR BIO-1 through DR BIO-25
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270250 Section 3.2.1 TN 270254 Appendix 3.2	No	See DR BIO-1 and DR BIO-2
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	TN 270250 Section 3.2.8 TN 270254 Appendix 3.2B Species Record Searches	Yes	None
[OPT-IN ONLY] Cal. Code Regs., tit. 20, § 1877 (a)	If the applicant is seeking incidental take authorization as described in California Fish and Game Code section 2081(b), the application shall include the information required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10). If the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602(a)(1)(A)-(F).	TN 270254 Appendix 3.2D	No	See DR BIO-3, DR BIO-4, and DR BIO-5

DATA COMPLETENESS WORKSHEET

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Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	TN 270250 Section 3.2.1 TN 270250 Section 3.2.2	No	See DR BIO-6, DR BIO-7, DR BIO-8, DR BIO-9, DR BIO-10, DR-11, DR BIO-12, DR BIO-13, DR BIO-14, and DR BIO-15
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic wildlife resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity Database (CNDDB), and a citation which includes the date the CNDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing	TN 270250 Section 3.2.1.4; Section 3.2.1.5; Section 3.2.1.6 TN 270254 Appendix 3.2A, Appendix 3.2B, Appendix 3.2C TN 270250 Figure 3.2-2; Figure 3.2-3A and B); Figure 3.2-4; Figure 3.2-5; Figure 3.2-6; Figure 3.2-7; and Figure 3.2-8	Yes	None

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include:			
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	TN 270250 Section 3.2.1.4 TN 270254 Appendix 3.2A, Appendix 3.2B	Yes	None
Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	TN 270250 Section 3.2.1.4 TN 270254 Appendix 3.2A, Appendix 3.2B	Yes	None
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	TN 270250 Section 3.2.1.4 TN 270254 Appendix 3.2A, Appendix 3.2B	No	See DR BIO-1
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	TN 270250 Section 3.2.1.4; Section 3.2.1.9 TN 270254 Appendix 3.2A, Appendix 3.2B	Yes	None
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the CNDDDB, California Fish and Game Code, Title 14 of the	TN 270250 Section 3.2.1.4; Section 3.2.1.8-3.2.10 TN 270254 Appendix 3.2A, Appendix 3.2B TN 270250 Figure 3.2-7	Yes	None

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: Biological Resources

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission or other responsible agency;			
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances;	TN 270250 Section 3.2.1.4; Section 3.2.1.8-3.2.10 TN 270254 Appendix 3.2A, Appendix 3.2B	Yes	None
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	TN 270250 Section 3.2.1.4; Section 3.2.1.8 TN 270254 Appendix 3.2A, Appendix 3.2B	Yes	None
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	TN 270250 Section 3.2.1.10	Yes	None
Appendix B (g) (13) (B)	Include a list of the species and habitat(s) observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors. Maps or aerial photographs shall include the following:	TN 270250 Section 3.2.1.3; Section 3.2.1.4; Section 3.2.1.5 through 3.2.1.9	No	See DR BIO-16
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under confidential cover) and 1:350,000 (for public viewing) that show	TN 270250 Figure 3.2-1A&B; Figure 3.2-3A&B; Figure 3.2-5; Figure 3.2-7	No	See DR BIO-16

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDDB, and the associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities.			
Appendix B (g) (13) (B) (ii)	Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided.	None	No	See DR BIO-17
Appendix B (g) (13) (B) (iii)	An aerial photo depicting state and federal jurisdictional features including state waters and wetlands delineated on maps at a scale of (1:2,400) showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance if wetlands occur within 250 feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application, Regional Water Quality Control Board (RWQCB)	TN 270250 Section 3.2.1.7; Section 3.2.2.1; Figure 3.2-2	No	See DR BIO-18

DATA COMPLETENESS WORKSHEET

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Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	application, or California Department of Fish and Wildlife Section 1600 et seq. permit requirements. For projects proposed to be located within the coastal zone, also provide aerial photographs or maps as described above that identify wetlands as defined by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Provided via Kiteworks	No	See DR BIO-5, DR BIO-6, DR BIO-7, DR BIO-13, DR BIO-16, DR BIO-17, and DR BIO-18
Appendix B (g) (13) (C)	A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate biological resources including the following:	See sections below	No	See DR BIO-7 and DR BIO-16

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Technical Area: **Biological Resources**

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Project Manager: Eric Veerkamp

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Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (13) (C) (i)	A list of sensitive species and habitats with a potential to occur (defined in (A) above) and include status (state, federal, California Native Plant Society, global rank, state rank, etc.)	TN 270254 Appendix 3.2A; Appendix 3.2B	Yes	None
Appendix B (g) (13) (C) (iii)	Perform nitrogen deposition modeling including the complete citation for references used in determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.	None	No	See DR BIO-17
Appendix B (g) (13) (D)	A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDDB records and field survey forms completed by the applicant's biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include:	TN 270250 Section 3.2.1.5; Section 3.2.1.9 TN 270254 Appendix 3.2F Biological Data Sheets	No	See DR BIO-19, DR BIO-20, and DR BIO-21

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Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

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Project Manager: Eric Veerkamp

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Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (13) (D) (i)	Current biological resources surveys conducted using appropriate field survey protocols (include references) during the appropriate season(s). State and federal agencies with jurisdiction shall be consulted for field survey protocol guidance prior to surveys if a protocol exists.	TN 270250 Section 3.2.1.5	No	See DR BIO-19 and DR BIO-20
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.	TN 270250 Section 3.2.1.7; Section 3.2.2.1 TN 270254, Appendix 3.2D	No	See DR BIO-18
Appendix B (g) (13) (E)	Impacts discussion of all impacts (direct, indirect, and cumulative) to biological resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Discussion shall also address sensitive species habitat impacts	TN 270250 Section 3.2.2; Section 3.2.3	No	See DR BIO-8, DR BIO-9, DR BIO-10, DR-11, DR BIO-12, DR BIO-13, DR BIO-14, and DR-BIO 15

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Completeness: Complete Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	from air emissions (i.e., nitrogen deposition);			
Appendix B (g) (13) (F)	A discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level of impacts, including, but not limited to the following:	TN 270250 Section 3.2.2; Section 3.2.4	No	See DR BIO-8, DR BIO-9, DR BIO-10, DR BIO-11, DR BIO-12, DR BIO-13, DR BIO-14, DR BIO-15, and DR BIO-17
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	TN 270250 Section 3.2.4	No	See DR BIO-8, DR BIO-9, DR BIO-10, DR BIO-11, DR BIO-12, DR BIO-13, DR BIO-14, DR BIO-15, and DR BIO-17
Appendix B (g) (13) (F) (ii)	All off-site habitat mitigation such as habitat improvement or compensation including management, and an identification of appropriate agency contacts for coordination and verification of proposed habitat mitigation measures.	TN 270250 Criterion 3.2-3	No	See BIO-22
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	TN 270250 Section 3.2.4	Yes	None
Appendix B (g) (13) (G)	A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project.	TN 270250 Section 3.2.4	Yes	None
Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as	TN 270250 Section 3.2.6; Section 3.2.7	No	See DR BIO-22, DR BIO-24, and DR BIO-25

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Biological Resources**

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270250 Section 3.2.5 and Table 3.2-4; Section 3.2.6	No	See DR BIO-25
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270250 Section 3.2.5 and Table 3.2-4; Section 3.2.6	Yes	None
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted	TN 270250 Section 3.2.7	No	See DR BIO-23 and DR BIO-24

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: Biological Resources

Project: Seahawk BESS

Technical Staff: Leane Dunn, Carol Watson

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Ann Crisp

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270250 Section 3.2.6	No	See DR BIO-23 and DR BIO-24

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project Manager: Eric Veerkamp

Project: Seahawk BESS

Docket: 26-OPT-02

Revision No. 0

Date: 7/8/2026

M. Hoke, R. Hatheway, L.

Technical Staff: DeOliveira

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A), 1877(a)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	TN 270445 Section 6.0	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270445 Section 6.0	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	TN 270445 Sections 2.0, 3.0, 4.0, 4.1, 5.0, 6.1, 6.1.3, 7.0 Confidential Cultural Resources Report References Cited	No	See DR CUL/TRI-1
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach,	TN 270445 Sections 8.0, 9.0	No	See DR CUL/TRI-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Seahawk BESS

Technical Staff: M. Hoke, R. Hatheway, L. DeOliveira

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features, areas, places, records, sacred places, cultural landscapes, or manuscripts, all of which may have significance according to criteria outlined in sections 21074 and 21084.2 of the Public Resources Code.	--	--	--
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location. This regional summary must address the potential for buried cultural resources and tribal cultural resources to occur in the project area. The summary, together with literature search results, must inform the field methods employed for identifying cultural resources and tribal cultural resources in the project area.	TN 270445 Sections 2.0, 3.0, 4.0, 5.0, 6.1.1, 6.1.3	Yes	
Appendix B (g) (2) (B)	The results of a literature search to identify cultural resources and tribal cultural resources within an area not less	TN 270445 Section 6.1	No	See DR CUL/TRI-3, DR CUL/TRI-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Seahawk BESS

Technical Staff: DeOliveira

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources or tribal cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources and tribal cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR §4853) shall be provided for all cultural resources and tribal cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Seahawk BESS

Technical Staff: M. Hoke, R. Hatheway, L. DeOliveira

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.			
Appendix B (g) (2) (C)	The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources and tribal cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than	TN 270455 Section 6.1.3	No	DR CUL/TRI-5

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Seahawk BESS

Technical Staff: DeOliveira

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	50 feet to either side of the right-of-way of project linear facility routes. New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel's distance from all proposed plant site boundaries. New historic architecture field reconnaissance ("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age. A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project Manager: Eric Veerkamp

Project: Seahawk BESS

Docket: 26-OPT-02

Revision No. 0

Date: 7/8/2026

M. Hoke, R. Hatheway, L.

Technical Staff: DeOliveira

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if archaeological resource or other sensitive resource locations are included). Information included in the technical report shall also be provided in the application, other sensitive resources, or areas of religious significance) shall be submitted under a request for confidentiality pursuant to California Code of Regulations, title 20, section 2501 et seq. At a minimum, the technical report shall include:			
Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	Confidential Cultural Resources Report Sections 3.0, 4.0, 5.0, 6.6, Appendix F	No	See DR CUL/TRI-3
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural and tribal cultural resources and a discussion of the cultural and tribal resources identified by the survey;	Confidential Cultural Resources Report Sections 5.2, 6.5.1, 6.5.2, Appendix F	Yes	
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource or tribal cultural resource may be impacted	Confidential Cultural Resources Report Appendix F	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Seahawk BESS

Technical Staff: M. Hoke, R. Hatheway, L. DeOliveira

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	by the project, also include the appropriate DPR 523 detail form for each such resource;			
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Confidential Cultural Resources Report Appendix A	No	See DR CUL/TRI-6
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for literature searches, surveys, and preparation of the technical report.	Confidential Cultural Resources Report Title page, Section 2.5.5, Appendix C	Yes	
Appendix B (g) (2) (D) (i)	A copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC.	Confidential Cultural Resources Report Appendix E	No	See DR CUL/TRI-7
Appendix B (g) (2) (D) (ii)	A copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.	Confidential Cultural Resources Report Section 6.3, Appendix E	No	See DR CUL/TRI-8

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project Manager: Eric Veerkamp

Project: Seahawk BESS

Docket: 26-OPT-02

Revision No. 0

Date: 7/8/2026

Technical Staff: M. Hoke, R. Hatheway, L. DeOliveira

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	Confidential Cultural Resources Report Section 6.3, Appendix E	Yes	
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	--	--	--
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	TN 270445 Section 9.0 Confidential Cultural Resources Report Section 8.0	Yes	
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural and tribal cultural resources and any unanticipated impacts to known cultural or tribal cultural resources; and	TN 270445 Section 9.0 Confidential Cultural Resources Report Section 8.0	Yes	
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.	TN 270445 Section 9.0 Confidential Cultural Resources Report Section 8.0	No	See DR CUL/TRI-9
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with	TN 270445 Sections 5.1.6, 5.1.7	No	See DR Cul/TRI-10

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Cultural Resources and Tribal Cultural Resources**

Project: Seahawk BESS

Technical Staff: M. Hoke, R. Hatheway, L. DeOliveira

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270445 Sections 5.1.6, 5.1.7	No	See DR CUL/TRI-11
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270445 Sections 5.1.6	No	See DR CUL/TRI-11
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270445 Sections 5.1.7	No	See DR CUL/TRI-12

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐

Revision No. 0 Date: 7/8/2026

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Seahawk BESS

Technical Staff: Jacob Locsin

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	N/A	N/A	N/A
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	N/A	N/A	N/A
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	TN 270250, Section 1; TN 270250, Section 2	Yes	
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	TN 270250, Section 2.5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐

Revision No. 0 Date: 7/8/2026

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Seahawk BESS

Technical Staff: Jacob Locsin

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance with applicable efficiency and operating standards.	N/A	N/A	N/A
Appendix B (h) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	TN 270249, Section 4	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: 7/8/2026

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Seahawk BESS

Technical Staff: Jacob Locsin

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Executive Summary**

Project: Seahawk BESS

Technical Staff: Eric Veerkamp

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	TN 270249 Section 5	Yes	
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics.	TN 270250 Section 1, Section 2, Section 3	Yes	
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county, and assessor's parcel numbers.	TN 270250 Section 1	Yes	
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	TN 270250 Section 1	Yes	
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	TN 270250 Section 1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **X**
 Technical Area: **Executive Summary** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Eric Veerkamp
 Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities. Provide the direct mailing addresses for the owners and occupants of properties contiguous to the proposed power plant, related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. Provide a map showing the parcels in the notice area.	TN 270287 Appendix 1A	No	See DR ES-1
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	TN 270250 Section 2.4.1 and 2.4.2	Yes	
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	TN 270250 Section 1.4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **X**
Revision No. 0 Date: 7/8/2026
 Technical Area: **Executive Summary**
Project: Seahawk BESS
 Project Manager: Eric Veerkamp
Docket: 26-OPT-02
Technical Staff: Eric Veerkamp
Technical Senior: Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	TN 270250 Section 1.4	Yes	
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in (a)(3)(A) and (B).	TN 270250 Section1.4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ____
 Technical Area: **Facility Design** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (1) (A)	A description of the site conditions and investigations or studies conducted to determine the site conditions used as the basis for developing design criteria. The descriptions shall include, but not be limited to, seismic and other geologic hazards, adverse conditions that could affect the project's foundation, adverse meteorological and climatic conditions, and flooding hazards, if applicable.	TN 270250 Sections 2.1 and 3.4.1; TN 270248 Section 3.11.1; TN 270249 Section 3.15.1	Yes	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	TN 270250 Section 3.4.4; TN 270248 Section 3.11.4; TN 270249 Section 3.15.4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete X Incomplete ____		Revision No. <u>0</u> Date: <u>7/8/2026</u>
Technical Area: Facility Design	Project: <u>Seahawk BESS</u>	Technical Staff: <u>Ardalan Sofi</u>
Project Manager: <u>Eric Veerkamp</u>	Docket: <u>26-OPT-02</u>	Technical Senior: <u>Shahab Khoshmashrab</u>

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation), analytical techniques, assumptions, loading conditions, and loading combinations to be used in the design of facility structures and major mechanical and electrical equipment.	TN 270250 Sections 2.4.3, 2.4.4, 2.4.5, 2.4.6, 2.4.7, and 3.4.1; TN 270248 Section 3.11.1; TN 270256 Appendices 3.4A and 3.4B	Yes	
Appendix B (h) (1) (D)	For each of the following facilities or systems, provide a description including drawings, dimensions, surface-area requirements, typical operating data, and performance and design criteria for protection from impacts due to adverse site conditions:	TN 270253 Appendices 2A and 2C	Yes	
Appendix B (h) (1) (D) (i)	The power generation system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (ii)	The heat dissipation system;	TN 270250 Section 2.3.1		
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	N/A	N/A	N/A
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	TN 270250 Sections 2.4.10, 2.4.11, 2.4.12, 2.5.1, 2.5.2, 2.5.3; TN 270249 Sections 3.14.1 and 3.14.2	Yes	
Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	TN 270250 Section 2.3.1.9; TN 270248 Section 3.7.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ☐

Technical Area: **Facility Design**

Project Manager: Eric Veerkamp

Project: Seahawk BESS

Docket: 26-OPT-02

Revision No. 0

Date: 7/8/2026

Technical Staff: Ardalan Sofi

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	N/A	N/A	N/A
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	TN 270250 Sections 2.3.1 and 2.3.2	Yes	
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	TN 270250 Sections 2.3.1 and 2.3.2	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known),	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐
 Technical Area: **Facility Design** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Geological Hazards** Project: Seahawk BESS
 Project Manager: Eric Veerkamp Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Nick Kehrlein
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270256 Appendix 3.4a	No	See DR GEO-1, DR GEO-2
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270256 Appendix 3.4a	No	See DR GEO-3
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270250 Section 3.4.8	No	See DR GEO-3
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed	TN 270256 Appendix 3.4a	No	See DR GEO-1, DR GEO-2, DR GEO-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Geological Hazards** Project: Seahawk BESS
 Project Manager: Eric Veerkamp Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Nick Kehrlein
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	TN 270250 Section 3.4.1.2; TN 270256 Appendix 3.4a	Yes	
Appendix B (g) (17) (B)	A map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. Include an analysis of the likelihood of ground rupture, seismic shaking, mass wasting and slope stability, liquefaction, subsidence, tsunami runup, and expansion or collapse of soil structures at the plant site. Describe known geologic hazards along or crossing linear facilities.	TN 270250 Figure 3.4-1, Figure 3.4-2	No	See DR GEO-3, DR GEO-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Geological Hazards** Project: Seahawk BESS
 Project Manager: Eric Veerkamp Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Nick Kehrlein
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.	TN 270250 Figure 3.4-5	No	See DR GEO-3
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270250 Table 3.4-2	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have	TN 270250 Table 3.4-3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Geological Hazards** Project: Seahawk BESS
 Project Manager: Eric Veerkamp Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Nick Kehrlein
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270250 - Section 3.4.6 Table 3.4-3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A		

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Hazardous Materials Handling**
 Project Manager: Eric Veerkamp

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Pete Hudson, Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270250 Section 3.5.2.1; TN 270258 Appendix 3.5A, TN 270262 Appendices 3.5D, 3.5E For hazards due to accidental BESS fire: MNS Report 3/6/26 TN270248_20260527T1110 29_Application for Opt-In Certification Part 2 Sections 4.3, 5.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270250 Section 3.5.2; TN 270258 Appendix 3.5A, TN 270262 Appendices 3.5D, 3.5E For hazards due to accidental BESS fire: MNS Report 3/6/26 TN270248_20260527T1110 29_Application for Opt-In Certification Part 2 Sections 4.3, 5.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270250 Section 3.5.8; TN 270258 Appendix 3.5A, Section 9; TN 270262 Appendix 3.5D, Section 8; TN 270262 Appendix 3.5E, Section 6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Hazardous Materials Handling**
 Project Manager: Eric Veerkamp

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Pete Hudson, Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	TN 270250 Section 3.5.2.2; Section 3.5.2.3: Criterion 3.5-1 through 3.5-5; Section 3.5.3.	Yes	
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.	TN 270250 Section 3.5.1.2; Subsection 3.5.1.2.1; Subsection 3.5.1.2.2	No	See DR HAZ-1
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	TN 270250 Section 3.5, Figures 3.5-1-1, 3.5-1-2, 3.5-1-3, and 3.5-1-4.	Yes	
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	TN 270250 Section 3.5.1; Section 3.5.2.3, Criterion 3.5-1 and 3.5-2 TN 270272 Appendix 3.16B	Yes	
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases	For hazards due to accidental BESS fire:	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Hazardous Materials Handling**
 Project Manager: Eric Veerkamp

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Pete Hudson, Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	that could result in off-site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the application is complete.	MNS Report 3/6/26 TN270248_20260527T1110 29_Application for Opt-In Certification Part 2 Sections 4.3, 5.2		
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) will be required, and if so, the requirements that will likely be incorporated into the plan.	TN 270250 Section 3.5.2.3, Criterion 3.5-2; TN270262 Appendix 3.5B]; TN 270262 Appendix 3.5C; TN 270272 Appendix 3.16C	Yes	
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	TN 270250 Sections 3.5.1.2 and 3.5.2.3; TN 270272 Appendix 3.16B	No	See DR HAZ-2
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	Section 3.5, Criterion 3.5-2 For hazards due to accidental BESS fire: MNS Report 3/6/26 TN270248_20260527T1110 29_Application for Opt-In Certification Part 2 Sections 4.3, 5.2	No	See DR HAZ-3
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein	TN 270250 Section 3.5.5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Hazardous Materials Handling**
 Project Manager: Eric Veerkamp

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Pete Hudson, Paul Miller
 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270250 Section 3.5.5	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270250 Section 3.5. Table 3.5-3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270250 Section 3.5.7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: Land Use

Project: Seahawk BESS

Technical Staff: Jeanine Hinde

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270250 Subsection 3.6.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates); and	TN 270250 Subsection 3.6.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270250 Subsection 3.6.8	No	See DR LAND-1
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to	TN 270250 Subsections 3.6.1, 3.6.2 (Criterion 3.6-2); Tables 3.6-3, 3.6-4, 3.6-5, and 3.6-7; Subsections 3.6.3 and 3.6.4	No	See "Appendix B (g) (3) (B)" below (under "Siting Regulations") and the related data requests

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Land Use**

Project: Seahawk BESS

Technical Staff: Jeanine Hinde

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (3) (A)	A discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	TN 270250 Subsections 3.6.1.2 and 3.6.1.3	Yes	
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	TN 270250 Subsections 3.6.1.2 and 3.6.1.3, Table 3.6-1; TN 270265 Appendix 3.6A	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: Land Use Project: Seahawk BESS

Technical Staff: Jeanine Hinde

Project Manager: Eric Veerkamp Docket: 26-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (3) (A) (ii)	A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level;	TN 270250 Subsection 3.6.2.3, Table 3.6-4	Yes	
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	TN 270250 Subsection 3.6.2.3, Table 3.6-4	Yes	
Appendix B (g) (3) (A) (iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.	TN 270250 Figures 3.6-3, 3.6-4, and 3.6-5	Yes	
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning	TN 270250 Subsection 3.6.2.3; Tables 3.6-3, 3.6-4, and 3.6-5; Subsections 3.6.3 and 3.6.5; Table 3.6-7	No	See DR LAND-2, DR LAND-3, DR LAND-4, DR LAND-5, DR LAND-6, DR LAND-7, and DR LAND-8

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Land Use Project: Seahawk BESS Technical Staff: Jeanine Hinde
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations.			
Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single legal parcel. The merger need not	TN 270250 Subsection 3.6.1.5, Table 3.6-2 TN 270264 Appendix 3.6B	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Land Use Project: Seahawk BESS Technical Staff: Jeanine Hinde
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	occur prior to a decision on the Application but must be completed prior to the start of construction.			
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	TN 270250 Subsections 3.6.1.4 and 3.6.2 (Criterion 3.6-3); Table 3.6-6	Yes	
Appendix B (g) (3) (D) (i)	Land classifications as shown on the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland maps, crop types, irrigation systems, and any special cultivation practices;	TN 270250 Subsections 3.6.1.4 and 3.6.5.2, Figure 3.6-6	Yes	
Appendix B (g) (3) (D) (ii)	Whether agricultural land affected by the project was historically classified Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and	TN 270250 Subsection 3.6.5.2, Figure 3.6-6	Yes	
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an	TN 270250 Subsection 3.6.2; Table 3.6-3; Subsection 3.6.3	No	See DR LAND-9

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Land Use** Project: Seahawk BESS

Technical Staff: Jeanine Hinde

Project Manager: Eric Veerkamp Docket: 26-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270250 Subsection 3.6.2.3; Table 3.6-3; Subsection 3.6.5; Table 3.6-7	No	See DR LAND-8
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive	TN 270250 Subsection 3.6.6, Table 3.6-8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: Land Use Project: Seahawk BESS

Technical Staff: Jeanine Hinde

Project Manager: Eric Veerkamp Docket: 26-OPT-02

Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270250 Table 3.6-8	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Noise** Project: Seahawk BESS
 Project Manager: Eric Veerkamp Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270250 and TN 270248 Section 3.7.1; TN 270266 Appendices 3.7B, 3.7D, and 3.7E	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270250 and TN 270248 Sections 3.7.1, 3.7.2; TN 270266 Appendices 3.7A, 3.7B, 3.7D, and 3.7E	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270250 and TN 270248 Sections 3.7.1 and 3.7.7	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the	TN 270250 and TN 270248 Sections 3.7.1, 3.7.2, 3.7.3, and 3.7.4	No	See DR NOISE-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Noise** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (4) (A)	A land use map which identifies residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either construction or operation, there is a potential increase of 5 dB(A) or more, over existing background levels.	TN 270250 Figure 3.7-1	Yes	
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature,	TN 270250 and TN 270248 Section 3.7.1; TN 270266 Appendix 3.7A	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Noise Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L ₁₀ , L ₅₀ , and L ₉₀ values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) shall also be reported in units of dB(A).			
Appendix B (g) (4) (C)	A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.	TN 270250 Section 3.7.2.3.1; TN 270266 Appendix 3.7D	Yes	
Appendix B (g) (4) (D)	An estimate of the project noise levels, during both construction	TN 270250 Section 3.7.2.3.1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Noise** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and operation, at residences, hospitals, libraries, schools, places of worship or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.			
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	TN 270250 Section 3.7.2.3.1	Yes	
Appendix B (g) (4) (F)	The audible noise from existing switchyards and overhead transmission lines that would be affected by the project and estimates of the future audible noise levels that would result from existing and proposed switchyards and transmission lines. Noise levels shall be calculated at the property boundary for switchyards and at the edge of the rights-of-way for transmission lines.	TN 270250 Sections 2.3.2.8 and 3.7.2.3	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land	TN 270250 Section 3.7.5 and Table 3.7-12	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Noise Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270250 Section 3.7.6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270250 Section 3.7.6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Noise Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Ardalan Sofi
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270250 Section 3.7.7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Paleontological Resources Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270248 Section 3.81 and 3.82	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270248 Section 3.82	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270248 Sections 3.8.2.1.1 and 3.8.8	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	TN 270248 Section 3.8.2.3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Paleontological Resources Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other adopted local, regional, or statewide plan.			
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting, formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.	TN 270248 Section 3.8.1	Yes	
Appendix B (g) (16) (B)	A discussion of the sensitivity of the project area described in subsection (g)(16)(A) and the presence and significance of any known paleontological localities or other paleontological resources within or adjacent to the project. Include a discussion of sensitivity for each geologic unit identified on the most recent geologic map at a scale of 1:24,000. Provide rationale as to why the sensitivity was assigned.	TN 270248 Section 3.8.2	Yes	
Appendix B (g) (16) (C)	A summary of all local museums, literature searches and field surveys used to provide information about paleontological resources in the project area described in (g)(16)(A). Identify the dates of the surveys, methods used in completing the surveys, and the names and qualifications of the individuals conducting the surveys.	TN 270248 Section 3.8.2.1.1, Confidential Appendix 3.8A	No	See DR PALEO-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Paleontological Resources Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey reports, locality records, and maps at a scale of 1:24,000, showing occurrences of fossil finds, if known, within a 1-mile radius of the project and related facilities shall be included in a separate appendix to the Application and submitted to the Commission under a request for confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.	N/A		
Appendix B (g) (16) (E)	A discussion of any educational programs proposed to enhance awareness of potential impacts to paleontological resources by employees, measures proposed for mitigation of impacts to known palaeontologic resources, and a set of contingency measures for mitigation of potential impacts to unknown paleontological resources.	TN 270248 Section 3.8.4	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with	TN 270248 Table 3.8-2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Paleontological Resources Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270248 Table 3.8-3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270248 Table 3.8-3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A		

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Eric Veerkamp

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Usama K., Mark Hamblin, EV
 Technical Senior: EV, Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide:	-	--	--
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	TN 270250 Section 2	Yes	
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities to establish the accuracy of the photo simulations required in sections (a)(1)(D) and (g)(6)(F);	TN 270523 Appendix 2A	Yes	
Appendix B (b) (1) (C)	A detailed description of the design, methods of construction (include depth of excavations and other ground disturbances) and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	TN 270250 Section 2.3, Section 2.4, Section 2.5	Yes	
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected, and the consideration given to engineering	TN 270250 Section 2.7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Eric Veerkamp

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Usama K., Mark Hamblin, EV
 Technical Senior: EV, Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and other factors considered by the applicant.			
Appendix B (b) (2)	In a section titled, "Transmission Lines Description, Design, and Operation" provide:	-	--	--
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	TN 270250 Figure 2-2	No	See DR PD-1
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.	TN 270250 Figures 1-4 and 1-5	No	See DR PD-2
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be	TN 270250 Section 2.3.2	No	See DR PD-3, with cross-reference to DR TSD-2, DR TSD-3, DR TSD-4, and DR TSD-5

DATA COMPLETENESS WORKSHEET

Completeness:	Complete ☐ Incomplete ☒	Revision No. <u>0</u>	Date: <u>7/8/2026</u>
Technical Area:	Project Description	Technical Staff:	<u>Usama K., Mark Hamblin, EV</u>
Project Manager:	<u>Eric Veerkamp</u>	Docket:	<u>26-OPT-02</u>
		Technical Senior:	<u>EV, Kaycee Chang</u>

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	served by the facility. Such description shall include the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.			
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints; and	TN 270250 Section 2.3.2	Yes	
Appendix B (b) (2) (E)	A completed System Impact Study or signed System Impact Study Agreement with the California Independent System Operator and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact Study agreement and proof of payment to the interconnecting utility. If the interconnection and operation of the proposed project will likely impact a transmission system that is not controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when applicable) with/to the	TN 270250 Section 2.3.2.5	No	DR-PD-4 (Refer to DR TSD-1)

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Project Description**
 Project Manager: Eric Veerkamp

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026
 Technical Staff: Usama K., Mark Hamblin, EV
 Technical Senior: EV, Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	impacted transmission owner or provide evidence that there are no system impacts requiring mitigation.			
Appendix B (b) (3)	Applications for geothermal facilities shall contain the following additional information:			
Appendix B (b) (3) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) showing the location of the geothermal leaseholds, along with a description by section, township, range, county, and assessor's parcel numbers of the leaseholds;	Not Applicable		
Appendix B (b) (3) (B)	Full-page color photographic reproductions of the geothermal leaseholds;	Not Applicable		
Appendix B (b) (3) (C)	A description of the process by which the geothermal leasehold was selected and the consideration given to engineering constraints, site geology, environmental impacts, water, steam, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant. Include references to any environmental documents which address steam field development;	Not Applicable		
Appendix B (b) (3) (D)	A detailed description of the type, quality, and characteristics of the geothermal resource, including pressure and temperature flow rates, constituents	Not Applicable		

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Project Description**

Project Manager: Eric Veerkamp

Project: Seahawk BESS

Docket: 26-OPT-02

Revision No. 0

Date: 7/8/2026

Technical Staff: Usama K., Mark Hamblin, EV

Technical Senior: EV, Kaycee Chang

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and concentrations of non-condensable gases, and constituent concentrations of dissolved solids, and descriptions and concentrations of any substances potentially harmful to public health and safety or to the environment;			
Appendix B (b) (3) (E)	Proposed locations of production and re-injection wells for the project. Include the applicant's assessment of geothermal resource adequacy, including the production history of those wells within the leaseholds dedicated to the project, including pressure decline curves as available; and	Not Applicable		
Appendix B (b) (3) (F)	A discussion of the potential impacts on the temperature, mineral content, and rate of flow of thermal springs affected by the project.	Not Applicable		
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	TN 270250 Section 2.6; TN 270252 Appendix 2G	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Public Health Project: Seahawk BESS Technical Staff: Ann Chu, w/ MRS staff (Greg C.)
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Qian, Joey H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270248 Section 3.9, Subsections 2.2, 3.2, 4, 5 For hazards due to accidental BESS fire: TN#270248, Section 3.9, Subsections 4.3, 5.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270248 Section 3.9, Subsections 2.1, 2.2, 3.2, 5.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270248 Section 3.9, Subsections 2.1, 2.2, 5.2, 9	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts	TN 270248 Section 3.9, Subsections 1, 2, 5	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026

Technical Area: Public Health Project: Seahawk BESS Technical Staff: Ann Chu, w/ MRS staff (Greg C.)

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Qian, Joey H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	TN 270248 Section 3.9, Subsection 5	Yes	
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic	TN 270248 Section 3.9, Attachment A	No	See DR PH-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026

Technical Area: Public Health Project: Seahawk BESS Technical Staff: Ann Chu, w/ MRS staff (Greg C.)

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Qian, Joey H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and print formats, used to prepare the HARP health risk assessment.			
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.	N/A		
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	TN 270248 Section 3.9, Subsection 2.4, Figure 3, Figure 4, and Figure 5 TN 270250 Figure 3.5-1-1, Figure 3.5-1-2, Figure 3.5-1-3, Figure 3.5-1-4	Yes	
Appendix B (g) (9) (E)	For this section, the following definitions apply:	--	--	--
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;	TN 270248 Section 3.9, Subsection 2.4	Yes	
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less	TN 270248 Section 3.9, Subsection 2.1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026

Technical Area: Public Health Project: Seahawk BESS Technical Staff: Ann Chu, w/ MRS staff (Greg C.)

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Qian, Joey H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	than or equal to one (1) hour; and			
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.	TN 270248 Section 3.9, Subsection 2.1	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270248 Section 3.9, Subsection 3	No	See DR PH-1
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement	TN 270248 Section 3.9, Subsections 7 and 8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026

Technical Area: Public Health Project: Seahawk BESS Technical Staff: Ann Chu, w/ MRS staff (Greg C.)

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Wenjun Qian, Joey H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270248 Section 3.9, Subsection 7	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270248 Section 3.9, Subsection 8	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: **Reliability** Project: Seahawk BESS Technical Staff: Jacob Locsin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (3) (A)	A discussion of the sources and availability of the fuel or fuels to be used over the estimated service life of the facilities.	N/A	N/A	N/A
Appendix B (h) (3) (B)	A discussion of the anticipated service life and degree of reliability expected	TN 270250 Sections 2.5 and 2.6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____

Technical Area: **Reliability** Project: Seahawk BESS

Project Manager: Eric Veerkamp Docket: 26-OPT-02

Revision No. 0 Date: 7/8/2026

Technical Staff: Jacob Locsin

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to be achieved by the proposed facilities on consideration of:			
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	TN 270250 Sections 2.5 and 2.6	Yes	
Appendix B (h) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;	TN 270250 Section 2.3; TN 270250 Section 2.5	Yes	
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	TN 270250 Section 2.3; TN 270250 Section 2.5; TN 270250 Section 3.4; TN 270248 Section 3.11; TN 270249 Section 3.15;	Yes	
Appendix B (h) (3) (B) (iv)	Special design features adopted by the applicant or resource supplier to ensure power plant reliability	TN 270250 Section 2.3; TN 270250 Section 2.5 TN 270250 Section 3.4; TN 270253 Appendix 2C	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____

Technical Area: **Reliability** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Jacob Locsin

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	including equipment redundancy; and			
Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	N/A	N/A	N/A
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____

Technical Area: **Reliability** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Jacob Locsin

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270248 Section 3.10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270248 Section 3.10	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;		No	See DR SOCIO-1
	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed	TN 270248 Section 3.10, Section 3 Table 3-1, 3-2	No	See DR SOCIO-2

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region affected by construction and operation of the project. Include:	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for	TN 270248 Section 3.10	No	See DR SOCIO-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	construction and operation of the project;			
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (A) (vi)	Capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule.		No	See DR SOCIO-4
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note	TN 270248 Section 3.10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	year of estimate, model, if used, and appropriate sources), including:			
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number of permanent operations workers during a year;		No	See DR SOCIO-5
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work during the project construction and operation;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical		No	See DR SOCIO-6

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating -phases;			
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	TN 270248 Section 3.10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment effects due to construction and operation of the project; and	TN 270248 Section 3.10	Yes	
Appendix B (g) (7) (B) (xiii)	A discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations.		No	See DR SOCIO-7
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The		No	See DR SOCIO-8

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.		No	See DR SOCIO-9
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.		No	See DR SOCIO-10

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. 0 Date: 7/8/2026

Technical Area: **Socioeconomics**

Project: Seahawk BESS

Technical Staff: Ellen L.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.		No	See DR SOCIO-11

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Soils Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270248 Appendix 3.4a	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270248 Appendix 3.4a	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 2709248 Section 3.11.8	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and	TN 2709248 Section 3.11.2	No	See DR GEO-4

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Soils Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (15) (A)	A map at a scale of 1:24,000 and written description of soil types and all agricultural land uses that will be affected by the proposed project. The description shall include:	TN 2709248 Figure 3.11-1	Yes	
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;	TN 2709248 Section 3.11.1	No	See DR GEO-4
Appendix B (g) (15) (A) (ii)	An identification of other physical and chemical characteristics of the soil necessary to allow an evaluation of soil erodibility, permeability, re-vegetation potential, and cycling of pollutants in the soil-vegetation system;	TN 2709248 Section 3.11.1; TN 270248 Appendix 3.4a	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Soils Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and	N/A		
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	TN 270248 Section 3.11.1.7	Yes	
Appendix B (g) (15) (B)	An assessment of the effects of the proposed project on soil resources and agricultural land uses. This discussion shall include:			
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and	TN 270248 Section 3.11.2.3	Yes	
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein	TN 270248 Table 3.11-2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: 7/8/2026
 Technical Area: **Soils** Project: Seahawk BESS Technical Staff: Nick Kehrlein
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270248 Table 3.11-3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270248 Table 3.11-3	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the	TN 270249 Section 3.15	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: 7/8/2026
Technical Area: **Soils** Project: Seahawk BESS Technical Staff: Nick Kehrlein
Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	applicant has taken or plans to take to obtain such permits.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X** Revision No. 0 Date: 7/8/2026

Technical Area: **Traffic and Transportation** Project: Seahawk BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: E. Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270248 Sections 3.12.1.7, 3.12.2.1, 3.12.2.2; TN 270268, Appendix 3.12	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates); and	TN 270248 Section 3.12.2; TN 270268 Appendix 3.12	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270248 Sections 3.12.1.7, 3.12.2.1, 3.12.5, 3.12.8	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to	TN 270248 Sections 3.12.1, 3.12.2.3, 3.12.3, 3.12.4	No	See DR TRANS-1 and DR TRANS-2.

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Traffic and Transportation Project: Seahawk BESS Technical Staff: Andrea Koch
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: E. Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	TN 270248 Section 3.12.5.3, Figures 3.12-1 through 3.12-4, Figure 3.12-10	Yes	
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede	See below	See below	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X** Revision No. 0 Date: 7/8/2026

Technical Area: **Traffic and Transportation** Project: Seahawk BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: E. Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	air navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include:			
Appendix B (g) (5) (B) (i)	A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities.	TN 270248 Figure 3.12-10	Yes	
Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	N/A	Yes	
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and	TN 270248 Section 3.12.2.3, Table 3.12.5	Yes	
Appendix B (g) (5) (B) (iv)	Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.	TN 270268 Appendix 3.12B	Yes	
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	See below	See below	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X** Revision No. 0 Date: 7/8/2026

Technical Area: **Traffic and Transportation** Project: Seahawk BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: E. Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	TN 270248 3.12.2.1	Yes	
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	TN 270248 3.12.2.1; TN 270268 Appendix 3.12	Yes	
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	N/A	Yes	
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	TN 270248 Sections 3.12.1.7, 3.12.2.1, 3.12.2.3, 3.12.5	Yes	
Appendix B (g) (5) (D)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	TN 270248 Figures 3.12-1 through 3.12-4	Yes	
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	TN 270248 Sections 3.12.2.3, 3.12.3	Yes	
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	TN 270248 Sections 3.12.2.3, 3.12.3	Yes	
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during	TN 270248 Sections 3.12.2.3, 3.12.3; TN 270268 Appendix 3.12A	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: **Traffic and Transportation** Project: Seahawk BESS Technical Staff: Andrea Koch
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: E. Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	construction, and during project operation;			
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	TN 270248, Section 3.12.1.5	Yes	
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	TN 270248, Sections 3.12.2.3, 3.12.3	Yes	
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.	TN 270248, Section 3.12.2.3	Yes	
Appendix B (g) (5) (E)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include:	TN 270248, Sections 3.12.2.3, 3.12.3	Yes	
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.	Not identified	No	See DR TRANS-1 and DR TRANS-2.
Appendix B (g) (5) (E) (ii)	Description of public roadways and intersections temporarily or permanently altered by construction and operation	TN 270248, 3.12.1.1	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: **Traffic and Transportation** Project: Seahawk BESS Technical Staff: Andrea Koch
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: E. Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	including the duration of activities.			
Appendix B (g) (5) (F)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.	TN 270248, Section 3.12.2.3	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270248 Section 3.12.2.1, 3.12.5	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue	TN 270248 Sections 3.12.5, 3.12.6	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X** Revision No. 0 Date: 7/8/2026

Technical Area: **Traffic and Transportation** Project: Seahawk BESS Technical Staff: Andrea Koch

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: E. Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270248 Section 3.12.6	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270248 Section 3.12.7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: 7/8/2026

Technical Area: **Transmission System**

Project Manager: **Safety and Nuisance**

Project: Seahawk BESS

Docket: 26-OPT-02

Technical Staff: Sudath E.

Technical Senior: Joseph H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270250 Section 2.3.2.8, Appendix 2F	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference	TN 270250 Section 1.2, Section 2.0	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete

Revision No. 0 Date: 7/8/2026

Technical Area: **Transmission System**

Project Manager: **Safety and Nuisance**

Project: Seahawk BESS

Docket: 26-OPT-02

Technical Staff: Sudath E.

Technical Senior: Joseph H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	TN 270250 Section 1.2, Section 2.0, Figure 1.1	Yes	
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.	TN 270250 Section 2.3.2.8	Yes	
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.	TN 270250 Section 2.3.2.8	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the but could proposed project, and a	TN 270250 Section 2.3, Table 2-3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete X Incomplete Revision No. 0 Date: 7/8/2026

Technical Area: Transmission System Project: Seahawk BESS Technical Staff: Sudath E.

Project Manager: Project Manager Docket: 26-OPT-02 Technical Senior: Joseph H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270250 Section 2.3, Table 2-3	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270250 Section 5.1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Transmission System

Technical Area: Design

Project: Seahawk BESS

Technical Staff: Usama K.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Joseph H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (h) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	TN 270250 Section 2.3.2	Yes	
Appendix B (h) (2) (B)	A discussion of the extent to which the proposed electric transmission	TN 270250 Section 2.3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Transmission System**

Design

Project: Seahawk BESS

Technical Staff: Usama K.

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Joseph H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	facilities have been designed, planned, and routed to meet the transmission requirements created by additional generating facilities planned by the applicant or any other entity.			
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	TN 270250 Section 2.1 - 2.3	No	See DR TSD-2 See DR TSD-3 See DR TSD-4 See DR TSD-5
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints.	TN 270250 Section 2.1 - 2.3	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards,	TN 270250 Table 2-3	No	See DR TSD-6

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ **Transmission System Design**

Revision No. 0 Date: 7/8/2026

Technical Area: **Design** Project: Seahawk BESS Technical Staff: Usama K.

Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Joseph H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
Transmission System Design
 Technical Area: Design Project: Seahawk BESS Technical Staff: Usama K.
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Joseph H.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Visual Resources Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270249 Sections 3.13.2.1, 3.13.2.2, 3.13.2.3	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270249 Sections 3.13.2.1, 3.13.2.2, 3.13.2.3,	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270249 Section 3.13.8	Yes	
Appendix B (g) (1)	... provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation, and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the	TN 270250 Figure 1-2, Figure 1-3 Figure 1-4, Figure 1-5a Figure 1-5b, Figure 1-5c, 2.1;Sections 3.13.1.1, 3.13.1.3, 3.13.2 TN 270249 Sections 3.13.2.3, 3.13.4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: **Visual Resources** Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	mitigation. Describe the approach, list or projection (or a combination of) used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (6) (A)	Provide a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity, and along the proposed routes for any aboveground project-related linear facilities. Include:	TN 270249 Sections 3.13.1.1, 3.13.1.2; TN 270250 Sections 1.1, 2.1	Yes	
Appendix B (g) (6) (A) (i)	Show on a map(s) (pinpoint) any designated or recognized scenic vista and scenic resource within a five-mile radius of the project and one-mile radius of a project-related linear facility. Include:	TN 270249 Figure 3.13-7	Yes	
Appendix B (g) (6) (A) (i) a.	Any designated scenic vista and scenic resource in an adopted federal, state, county, or city government planning document, plan, or regulation.	TN 270249 Figure 3.13-7	Yes	
Appendix B (g) (6) (A) (i) b.	A natural feature or object that is a part of the land, such as a geologic distinguishing characteristic (e.g., laccolith),	TN 270249 Figure 3.13-7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Visual Resources Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	geomorphologic feature (e.g., gorge), or other terrain feature (e.g., a water body, open space, or a tree recognized for its aesthetic, botanical and ecological value, or age, rarity, and size).			
Appendix B (g) (6) (A) (i) c.	A man-made feature or object that embodies elements of architecture or engineering design, detail, materials or craftsmanship that represent a significant innovation or is unique, such as the California State Capitol, Golden Gate Bridge, or Hollywood Sign.	TN 270249 Figure 3.13-7	Yes	
Appendix B (g) (6) (A) (i) d.	Explain does the project eliminate or obstruct the public view (the visible area from a location where the public has a legal and physical right of access to real property) of a scenic vista and scenic resource? Is the project situated so that it changes the visual aspect of a scenic resource by being different or in sharp contrast?	TN 270249 Section 3.13.2.3, Figure 3.13-2a, Figure 3.13-2b	Yes	
Appendix B (g) (6) (A) (ii)	Describe the existing nighttime lighting on the project site and in the vicinity.	TN 270249 Section 3.13.1.2	Yes	
Appendix B (g) (6) (B)	In accordance with CEQA Guidelines as found in 14 CCR	Not applicable	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: **Visual Resources** Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within an "urbanized area" as defined in Public Resources Code section 21071, explain the project's conformance with the city/county General Plan, and city municipal code or county government code (e.g., zoning) governing scenic quality.			
Appendix B (g) (6) (C)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within a non-urbanized area provide the following:	TN 270249 Section 3.13.2.3	Yes	
Appendix B (g) (6) (C) (i)	Show on a map the pinpoint location of the key observation point(s) (KOP) for the project. A KOP is a fixed position in a publicly accessible location where a public view of the project is analyzed and/or evaluated in the landscape. Objects of aesthetic significance are the primary focus in the KOP selection.	TN 270249 Figure 3.13-3	Yes	
Appendix B (g) (6) (C) (ii)	If an object of aesthetic significance is not in the vicinity of	TN 270249 Section 3.13.2, Table 3.13-3, Figure 3.13-3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: **Visual Resources** Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the project, a KOP is to be selected based on importance to stakeholders, visibility, direct public selection, worst-case scenario, or other reason. Explain the reason the KOP was chosen. At a minimum two KOPs are to be selected.			
Appendix B (g) (6) (C) (iii)	Provide a color photograph(s) showing an actual line of sight at eye level during daytime and clear weather from the KOP to the project site prior to any alteration (existing condition). The photographer at the KOP is to use a standard lens. For each photograph provide the following information: camera type, lens focal length, viewing angle; date and time the photograph was taken, and the distance to the project site.	TN 270249 Figure 3.13-3, Figure 3.13-4a, Figure 3.13-5a, Figure 3.13-6a	Yes	
Appendix B (g) (6) (C) (iv)	Using the photograph from the KOP provide a spatially accurate and realistically photo manipulated computer simulated image of the project (photo-realistic simulation) one-year after completion of construction (existing condition plus proposed project).	TN 270249 Figure 3.13-4b, Figure 3.13-5b, Figure 3.13-6b	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐

Technical Area: **Visual Resources**

Project Manager: Eric Veerkamp

Project: Seahawk BESS

Docket: 26-OPT-02

Revision No. 0

Date: 7/8/2026

Technical Staff: Mark Hamblin

Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (6) (C) (v)	The KOP photograph and the photo-realistic simulation are to be capable of 11" x 17" color print by a printer capable at a minimum 600 dots per inch output resolution.	TN 270249 Figure 3.13-3, Figure 3.13-4a, Figure 3.13-5a, Figure 3.13-6a, Figure 3.13-4b, Figure 3.13-5b, Figure 3.13-6b	Yes	
Appendix B (g) (6) (C) (vi)	Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file.	TN 270249 Section 3.13.2.1, Figure 3.13-3	Yes	
Appendix B (g) (6) (D)	Show and describe the project in the landscape.	TN 270249 Section 3.13.2.3, Figure 1-2, Figure 3.13-3, Figure 3.13-4a, Figure 3.13-5a, Figure 3.13-6a, Figure 3.13-4b, Figure 3.13-5b, Figure 3.13-6b	Yes	
Appendix B (g) (6) (D) (i)	Provide an 8.5" x 11" sized scaled elevation(s) of project buildings, structures, and major equipment; a table listing their dimensions (height, length, width, diameter).	TN 270249 Section 2 Appendices Part 1	Yes	
Appendix B (g) (6) (D) (ii)	Provide a table and description of the exterior surface treatments and finishes for the buildings, structures, major equipment (e.g., colors, flat and/or textured finishes), and structural materials.	TN 270249 Section 3.13.1.3, Table 3.13-1	Yes	
Appendix B (g) (6) (D) (iii)	Describe project specific architectural treatment or design technique mitigation unique to the project's siting at the location	None	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Visual Resources Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	(e.g., camouflage, disguise, screen), if any.			
Appendix B (g) (6) (D) (iv)	Provide a project specific conceptual landscape design plan that conforms with the city municipal code or county government code. Include:	TN 270253 Section 2 Appendices Part 1, Appendix 2B	Yes	
Appendix B (g) (6) (D) (iv) a.	the type of plant and/or tree species, location, quantity, size, spacing at installation/planting, expected growth rates, and expected heights at one-year, five years, and maturity. Specify irrigation system components and show their locations.	TN 270253 Section 2 Appendices Part 1, Appendix 2B	Yes	
Appendix B (g) (6) (D) (iv) b.	the calculated total pervious surface amount for the project site; include the surface to be replaced, the new surface, and the total area to be landscaped.	TN 270253 Section 2 Appendices Part 1, Appendix 2C	Yes	
Appendix B (g) (6) (D) (v)	Provide a project specific conceptual outdoor lighting control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.	TN 270252 Section 2 Appendices Part 2, Appendix 2D	Yes	
Appendix B (g) (6) (D) (v) a.	Provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi	TN 270252 Section 2 Appendices Part 2, Appendix 2D	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Visual Resources Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	cutoff, non cutoff) and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires locations on a diagram or elevation.			
Appendix B (g) (6) (D) (v) b.	Describe reflectance, the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment offsite to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object—how bright it shines—depends on the intensity of the light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel).	TN 270249 Section 3.13.1.3	Yes	
Appendix B (g) (6) (E)	If the project is to use a cooling tower emitting a publicly visible water vapor plume (visible plume) in the atmosphere provide the following information:	Not applicable	Yes	
Appendix B (g) (6) (E) (i)	Provide the cooling tower's number of fan cells, the fan cell stack height and diameter, the	Not applicable	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: **Visual Resources** Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	exhaust mass flow rate, heat rejection rate, and exhaust temperature.			
Appendix B (g) (6) (E) (ii)	Provide fogging curves specific to the cooling tower's exhaust discharge for at least three ambient air temperature conditions (a low, average, and high temperature condition).	Not applicable	Yes	
Appendix B (g) (6) (E) (iii)	Explain if the project's forecasted visible plume emitted in the atmosphere by the cooling tower would eliminate or obstruct an existing public view of a designated or recognized scenic vista, scenic resource, and the existing visual character or quality of public views of the site and its surroundings.	Not applicable	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each	TN 270249 Section 3.13.5, Table 3.13-4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Visual Resources Project: Seahawk BESS Technical Staff: Mark Hamblin
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Eric K.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	TN 270249 Section 3.13.6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff.	TN 270249 Section 3.13.6	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270249 Section 3.13.7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete _____
 Technical Area: **Waste Management** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Nick K.
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270249 Section 3.14	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270249 Section 3.14	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270249 Section 3.14	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the	TN 270249 Section 3.14.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐
 Technical Area: **Waste Management** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Nick K.
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment (ESA) for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination. The Phase I ESA shall have been completed no earlier than one year prior to the filing of the application.	Appendix 3.5A	Yes	
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or	TN 270249 Table 3.14-3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐
 Technical Area: **Waste Management** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Nick K.
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.			
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under California Code of Regulations, Title 23, section 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.	TN 270249 Section 3.14.1.3, Table 3.14-1	Yes	
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.	TN 270249 Table 3.14-2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐
 Technical Area: **Waste Management** Project: Seahawk BESS Revision No. 0 Date: 7/8/2026
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Staff: Nick K.
 Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270249 Table 3.14-4	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270249 Table 3.14-5	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270249 Table 3.14-5	Yes	

DATA COMPLETENESS WORKSHEETCompleteness: Complete **X** Incomplete Technical Area: **Waste Management**Project Manager: Eric VeerkampProject: Seahawk BESSDocket: 26-OPT-02Revision No. 0 Date: 7/8/2026Technical Staff: Nick K.Technical Senior: Karim A.

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix 3.5B	Yes	

Completeness: Complete___ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Seahawk BESS**
 Docket: **26-OPT-02**

Revision No. **0** Dat **7/8/2026**
 Technical Staff: **Ghazal M., James A.**
 Technical Senior: **Karim A**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270249 Section 3.15.2; TN 270270 Appendix 3-15A; Appendix 3-15B; Appendix 3-15C, Attachments A & B; TN 270271 Attachments C-F; Appendix 3-15D	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270249 Section 3.15.2, TN 270270 Appendix 3-15A; Appendix 3-15B; Appendix 3-15C, Attachments A & B; TN 270271 Attachments C-F; Appendix 3-15D	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270249 Section 3.15.7	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as	TN 270249 Section 3.15.1 through 3.15.4	Yes	

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Water Resources
 Project Manager: Eric Veerkamp

DATA COMPLETENESS WORKSHEET

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Dat 7/8/2026
 Technical Staff: Ghazal M., James A.
 Technical Senior: Karim A

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:	--	--	--
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);	TN 270249 Section 3.15.5.1, Section 3.15.5.2; Table 3.15-4; TN 270254 Appendix 3-2D, Attachment D, Section 7	No	See DR-WATER-1
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	TN 270249 Section 3.15.5.1	No	See DR-WATER-3
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	TN 270249 Section 3.15.5.1; TN 270254 Appendix 3-2D, Attachment D, Section 7	No	See DR-WATER-2
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A	N/A	
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The information shall include a narrative discussion and on maps at a scale of 1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:	TN 270249 Section 3.15.1.1 & 3.15.1.2, p. 3.15-4; Fig. 3.15-1; Fig. 3.15-2; Fig. 3.15-3; TN 270270 Appendix 3-15A; TN 270271 Appendix 3-15D, Section 4.1	Yes	
Appendix B	Ground water bodies and related geologic structures;	TN 270249 Section 3.15.1.3.1; Fig. 3.15-4.	Yes	

Completeness: Complete___ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Seahawk BESS**
 Docket: **26-OPT-02**

Revision No. **0** Dat **7/8/2026**
 Technical Staff: **Ghazal M., James A.**
 Technical Senior: **Karim A**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
(g) (14) (B) (i)				
Appendix B (g) (14) (B) (ii)	Surface water bodies;	TN 270249 Section 3.15.1.2, Fig. 3.15-1: Fig. 3.15-2	Yes	
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	TN 270249 Section 3.15.1.5, Fig. 3.15-7	Yes	
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	TN 270252 Section 2 Appendices, Drawings C-4.1, C-5.1, C-5.2, C-6.1 & C-6.2. TN270270 Appendix 3.15A	Yes	
Appendix B (g) (14) (B) (v)	Groundwater wells within ½ mile if the project will include pumping.	N/A	NA	
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	--	--	--
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	TN 270249 Section 3.15.2.3, TN 270250 Section 2.4.9; TN 270271 Appendix 3.15D	No	See DR-WATER-4
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment. For source waters with seasonal variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of	TN 270249 Section 3.15.1.3.1; Section; Table 3.15-2; TN 270271 Appendix 3.15D, Section 4.2	No	See DR-WATER-5

Completeness: Complete ___ Incomplete **X**

Technical Area: **Water Resources**

Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Seahawk BESS**

Docket: **26-OPT-02**

Revision No. **0** Dat **7/8/2026**

Technical Staff: **Ghazal M., James A.**

Technical Senior: **Karim A**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	background material used to create this description (that is, laboratory analysis);			
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	TN 270249 Section 3.15.2.3; (TN270250) Section 2.4.9; TN 270271 Appendix 3.15D, Section 2.2, Table 4	Yes	
Appendix B (g) (14) (C) (iv)	A detailed description of all facilities to be used in water conveyance (from primary source to the power plant site), water treatment, and wastewater discharge. Include a water mass balance diagram;	TN 270250 Section 2.4.9	Yes	
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary assurances from the water purveyor to serve the project;	N/A	NA	
Appendix B (g) (14) (C) (vi)	For all water supplied which necessitates transfers and/or exchanges at any point, identify all parties and contracts/agreements involved, the primary source for the transfer and/or exchange water (that is, surface water, groundwater), and provide the status of	TN 270249 Section 3.15.2.3; TN 270250 Section 2.4.9; TN 270271 Appendix 3.15D, Section 6.1.	No	See DR-WATER-6

Completeness: Complete___ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Seahawk BESS**
 Docket: **26-OPT-02**

Revision No. **0** Dat **7/8/2026**
 Technical Staff: **Ghazal M., James A.**
 Technical Senior: **Karim A**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	all appropriate agencies' approvals for the proposed use, environmental impact analysis on the specific transfers or exchanges required to obtain the proposed supplies, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agency regulation(s);			
Appendix B (g) (14) (C) (vii)	Provide water mass balance and heat balance diagrams for both average and maximum flows that include all process or ancillary water supplies and wastewater streams. Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and	N/A	NA	
Appendix B (g) (14) (C) (viii)	For all projects which have a discharge, provide a copy of the will-serve letter, permit or contract with the public or private entity that will be accepting the wastewater and contact storm water from the project. The letter, permit or contract, if possible, shall identify the discharge volumes and the chemical or physical characteristics under which the wastewater and contact storm water will be accepted. In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and	N/A	N/A	

Completeness: Complete___ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Seahawk BESS**
 Docket: **26-OPT-02**

Revision No. **0** Dat **7/8/2026**
 Technical Staff: **Ghazal M., James A.**
 Technical Senior: **Karim A**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.			
Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	--	--	--
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area that may be affected by the project's construction and operation;			
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;	TN 270249 Section 3.15.2.3; TN 270252 Design drawings C-2.1 – C-2.4, C-3.0 – C-3.4, C-4.1, C-5.1 & C-5.2, C-6.1 & C-6.2; TN 270270 Appendix 3.15A, Attachment B.	Yes	

Completeness: Complete___ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Seahawk BESS**
 Docket: **26-OPT-02**

Revision No. **0** Dat **7/8/2026**
 Technical Staff: **Ghazal M., James A.**
 Technical Senior: **Karim A**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and	TN 270249 Section 3.15.2.3; TN 270252 Design drawings C-3.0, C-3.2, C-3.4 – C-3.6, C-4.1, C-5.1 & C-5.2, C-6.1 & C-6.2; TN 270270 Appendix 3.15A, Attachments A & B	No	See DR-WATER- 7, 8 & 9
Appendix B (g) (14) (D) (iv)	A copy of applicable regional and local requirements regulating the drainage systems, and a discussion of how the project's drainage design complies with these requirements.	TN 270249 Section 3.15.5.3; Table 3.15-3; Section 3.15.2.2; TN 270270 Appendix 3.15A, Appendix 3.15B, Fig. SWA-25; TN 270252 Design drawings C-4.1.	Yes	
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	--	--	--
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	TN 270249 Section 3.15.2.2; Section 3.15.3; TN 270271 Appendix 3.15D, Section 6 & 7	Yes	
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a computer modeling study	N/A	NA	

Completeness: Complete___ Incomplete **X**
 Technical Area: **Water Resources**
 Project Manager: **Eric Veerkamp**

DATA COMPLETENESS WORKSHEET

Project: **Seahawk BESS**
 Docket: **26-OPT-02**

Revision No. **0** Dat **7/8/2026**
 Technical Staff: **Ghazal M., James A.**
 Technical Senior: **Karim A**

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	shall be conducted by a professional geologist and include the estimated drawdown on neighboring wells within 0.5 mile of the proposed well(s), any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical conditions of groundwater resources shall be provided;			
Appendix B (g) (14) (iii)	The effects of construction activities and plant operation on water quality and to what extent these effects could be mitigated by best management practices;	TN 270249 Section 3.15.2.3; Section 3.15.3. TN 270270 Appendices 3.15B and 3.15C	Yes	
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"	N/A	NA	
Appendix B (g) (14) (v)	If using fresh water, include a discussion of the cumulative impacts, alternative water supply sources and alternative cooling technologies considered as part of the project design. Include an explanation of why alternative water supplies and	TN 270249 Section 3.15.3; TN 270271 Appendix 3.15D	Yes	

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Water Resources
 Project Manager: Eric Veerkamp

DATA COMPLETENESS WORKSHEET

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Dat 7/8/2026
 Technical Staff: Ghazal M., James A.
 Technical Senior: Karim A

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	alternative cooling are "environmentally undesirable," or "economically unsound;"			
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones; and	TN 270249 Section 3.15.1.5; Section 3.15.2.3, p. 3.15-14; Section 3.15.2.4, p. 3.15-14; Figure 3.15-7	Yes	
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	TN 270249 Section 3.15; TN 270270 Appendices 3.15A, 3.15B, 3.15C	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270249 Table 3.15-3	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270249 Table 3.15-4	Yes	

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Water Resources
 Project Manager: Eric Veerkamp

DATA COMPLETENESS WORKSHEET

Project: Seahawk BESS
 Docket: 26-OPT-02

Revision No. 0 Dat 7/8/2026
 Technical Staff: Ghazal M., James A.
 Technical Senior: Karim A

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	TN 270249 Table 3.15-4	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270249 Section 3.15.6 & Table 3.15-4	No	See DR-WATER-10

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Wildfire Project: Seahawk BESS Technical Staff: Paul Miller (RCH)
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270249 Section 3.16.1 & 2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270249 Section 3.16.2	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	TN 270249 Section 3.16.8	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for	TN 270249 Sections 3.16.2 and Section 3.16.3	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Wildfire Project: Seahawk BESS Technical Staff: Paul Miller (RCH)
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (19) (A)	A map showing State Responsibility Areas (SRA,) as defined in Public Resources Code section 4102, relative to the proposed project.	TN 270249 Section 3.16, Figure 3.16-2.	Yes	
Appendix B (g) (19) (B)	A map showing state Fire Hazard Severity Zones, as defined in 14 CCR section 1280.01, relative to the proposed project.	TN 270249 Section 3.16, Figure 3.16-2	Yes	
Appendix B (g) (19) (C)	If the project would be in the vicinity of an SRA or a Very High Fire Hazard Severity Zone, as defined in 14 CCR section 1265.00, provide:	--	--	--
Appendix B (g) (19) (C) (i)	Local emergency response or evacuation plans and a description of how the proposed project could influence their effectiveness.	TN 270249 Section 3.16.2.3, Criterion 3.16-1	Yes	
Appendix B (g) (19) (C) (ii)	A discussion of how potential project pollutants could be contained onsite during a wildfire event.	TN 270249 Section 3.16.2.3, Criterion 3.16-2	Yes	
Appendix B (g) (19) (C) (iii)	A description of infrastructure that would be built or maintained (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate the risk of wildfire.	TN 270249 Section 3.16.2.3, Criterion 16-3. TN 270272 Appendix 3.16B	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☒ Incomplete ☐ Revision No. 0 Date: 7/8/2026
 Technical Area: Wildfire Project: Seahawk BESS Technical Staff: Paul Miller (RCH)
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (19) (C) (iv)	Describe people or structures downslope or downstream of the proposed project that could be impacted by flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	TN 270249 Section 3.16.2.3, Criterion 16-4	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Worker Safety**

Project: Seahawk BESS

Technical Staff: Paul Miller (RCH), Michele Shi

Project Manager: Eric Veerkamp

Docket: 26-OPT-02

Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	TN 270249 Section 3.17.2; TN 270272 Appendix 3.16B; TN 270272 Appendix 3.16C; TN 270271 Appendix 3.15D	No	See DR WS-11 to DR WS-14
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	TN 270249 Section 3.17.2; TN 270272 Appendix 3.16B; TN 270272 Appendix 3.16C; TN 270271 Appendix 3.15D	No	See DR WS-11 to DR WS-14
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	TN 270249 Section 3.17.3 and 3.17.6	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any	TN 270249 Section 3.17.1 and 3.17.2 TN 270249 Section 3.16.1.9	No	See DR WS-1 to DR WS-7

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 0 Date: 7/8/2026
 Technical Area: Worker Safety Project: Seahawk BESS Technical Staff: Paul Miller (RCH), Michele Shi
 Project Manager: Eric Veerkamp Docket: 26-OPT-02 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	TN 270249 Section 3.17.2.3 TN 270272 Appendix 3.16C	Yes	
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	TN 270249 Sections 3.17.2.3.2 and 3.17.2.4; TN 270272 Appendix 3.16B	No	See DR WS-8 to DR WS-10 and DR WS-15
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	--	--	--
	Construction Health and Safety Program:	TN 270249 Section 3.17.2.3.1	Yes	
	• Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);			
	• Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);	TN 270249 Section 3.17.2.3.1	Yes	
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)	TN 270249 Section 3.17.2.3.1	Yes	
	Operation Health and Safety Program:	TN 270249 Section 3.17.2.3.2	Yes	
	• Injury and Illness Prevention Program (8 Cal. Code Regs., § 3203);			
	• Fire Prevention Plan (8 Cal. Code Regs., § 3221);	TN 270249 Section 3.17.2.3.2	Yes	
	• Emergency Action Plan (8 Cal. Code Regs., § 3220);	TN 270249 Section 3.17.2.3.2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 0 Date: 7/8/2026

Technical Area: **Worker Safety**

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		TN 270272 Appendix 3.16C		
	Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411).	TN 270249 Section 3.17.2.3.2	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	TN 270249 Section 3.17.3 Table 3.17-6	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	TN 270249 Section 3.17.4 Table 3.17-7; Section 3.17.5, Table 3.17-8	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and	TN 270249 Section 3.17.4 Table 3.17-7	Yes	

DATA COMPLETENESS WORKSHEET

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Revision No. 0 Date: 7/8/2026

Technical Area: **Worker Safety**

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND TN	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	TN 270249 Section 3.17.5 Table 3.17-8	Yes	

Attachment B

Data Requests

ATTACHMENT B

CEC DATA REQUESTS

MANDATORY OPT-IN REQUIREMENTS

California Code of Regulations, title 20, section 1877(g) requires the application contain a plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a community organization or a coalition of one or more community organizations, consistent with Public Resources Code section 25545.10. Appendix 1D, "Community Benefits Plan," TN 270251, contains a discussion of a stated commitment to participate in the Santa Cruz County community benefits fund; however, the appendix does not include agreements, even draft agreements, a proposal to enter into agreements, or a timeline for execution of any such agreements.

DR MAND-1. Please provide a plan or strategy, including a timeline for execution, to obtain a legally binding and enforceable agreement(s) that benefits one or more community-based organizations consistent with Public Resources Code section 25545.10.

Pursuant to Public Resources Code section 25545.19, documentation of consultation with the authority that has jurisdiction over fire suppression in the area where the energy storage system is proposed is required. Consultation shall have occurred at least 30 days before submitting the application. Documentation shall include the date, the names and titles of participants, a summary of matters discussed, and a description of how the application addresses those matters. If the authority with jurisdiction has declined the opportunity to meet or has not responded within 30 days, documentation includes these interactions.

DR MAND-2. Please provide documentation of consultation with the authority having jurisdiction over fire suppression in the area where the energy storage system is proposed, consistent with Public Resources Code section 25545.19. The documentation should demonstrate that consultation occurred at least 30 days before submission of the application and should include: the date of the consultation; the names and titles of the participants; a summary of the matters discussed; and a description of how the

application addresses the matters discussed during consultation. See also DR WS-14.

AIR QUALITY

Section 3.1, Subsection 5 of the application (TN 270250) states that because emissions from criteria air pollutants during construction would be below the Monterey Bay Air Resources District's (MBARD) significance thresholds for construction, construction impacts on nearby sensitive receptors would be considered less than significant.

However, given the proximity of nearby sensitive receptors, air dispersion modeling is needed to comprehensively evaluate project construction impacts against criterion "c" of the CEQA environmental checklist to determine whether the project would expose sensitive receptors to substantial pollutant concentrations. This would include comparing modeled concentrations against state and federal impact thresholds.

DR AQ-1. Please provide an ambient air quality impacts analysis of all criteria pollutant concentrations including nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM₁₀), and particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), using a dispersion model such as AERMOD, during construction and compare these concentrations with the thresholds for state and federal Ambient Air Quality Standards or provide justification for why such modeling is not needed.

In Section 3.1, Subsection 5 of application (TN 270250), the applicant provides a project design feature (PDF-2) stating that the project would mandate "standard construction practices" in their construction contract to reduce construction fugitive dust emissions.

The MBARD, in their CEQA Guidelines, provide a list of feasible mitigation measures for construction impacts (Section 8.2 of the MBARD CEQA Guidelines). CEC staff needs to know which of the listed feasible mitigation measures the applicant intends to implement, and for those mitigation measures that will not be implemented, justification for why they will not be included.

DR AQ-2. Please provide the fugitive dust mitigation measures from Section 8.2 of the MBARD CEQA Guidelines that the project

intends to implement. For listed fugitive dust mitigation measures that will not be implemented by the project, please provide justification for why the mitigation measures will not be included.

Appendix B (i) (1) (A) of the Cal. Code Regs., tit. 20, Div. 2, Ch. 5, require that an application include "tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed."

The applicant does not provide a table or matrix in the air quality section (Section 3.1) of the application (TN 270250), that describes the applicable air quality laws, ordinances, regulations, and standards or how the project will conform with each of them.

DR AQ-3. Please provide a table that identifies air quality-related laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

ALTERNATIVES

Per Cal. Code Regs., tit. 20, Div. 2, Ch. 5, Appendix B (f) (1), an application must include "...[a] discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..." Per CEQA Guidelines Section 15124(b), a clearly written statement of objectives is an important component of the environmental impact report (EIR), as it will "...[h]elp the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary."

In application Section 2.2, the project objectives focus on improving grid reliability in the Santa Cruz County region by receiving energy from, and discharging to, the PG&E electric transmission system (TN 270429). The applicant states that it considered alternative locations to the project site that are "...[c]entered around an interconnection to an existing transmission substation that is owned and operated by PG&E" (TN 270429, Section 4.5.1). The applicant further acknowledges that the project's proposed interconnection to the PG&E Green Valley Substation is due to the available system capacity in this location (TN 270429, Section 4.5.1). CEC staff assumes that any PG&E substation or generation facility within the surrounding region that has capacity for interconnecting a BESS facility could facilitate a feasible location for the proposed project.

In considering alternative sites, the application reviewed three PG&E substations within Santa Cruz County that "...[h]ave adequate equipment for generation interconnection," but concluded that there were no suitable parcels for a BESS facility near these substations due to topographical constraints and the extent of the surrounding development (TN 270429, Section 4.5.1). However, CEC staff notes that the Moss Landing Power Plant in Monterey County is located approximately 10 miles from the project, which could have available gen-tie infrastructure and space to accommodate the proposed project within the PG&E transmission system. Siting a utility-scale BESS at an existing power plant could avoid the development of a new industrial use on existing agriculture or undeveloped land. Further, CEC staff has reviewed the project's Large Generator Interconnection Agreement (LGIA), which identifies a direct interconnection between the Green Valley Substation and the Moss Landing Power Plant via two 115-kV lines (LGIA Appendix C, Figure C-1). Staff requests the information listed in DR ALT-1 to determine if the Moss Landing Power Plant could be a feasible alternative site within the PG&E transmission system.

DR ALT-1. Please provide a discussion of the feasibility of siting the proposed BESS facility at the Moss Landing Power Plant that includes the following information:

- a. Does the PG&E electric transmission system have sufficient capacity to interconnect a 200 MW, 800 MWh BESS facility at the Moss Landing Power Plant? If so, what additional infrastructure would be needed?

- b. Does the Moss Landing Power Plant have sufficient space to accommodate a 200 MW, 800 MWh BESS? If a smaller BESS facility would be required, what size BESS facility could be constructed?
- c. Would there be engineering constraints to siting a BESS facility at the Moss Landing Power Plant? If there are engineering constraints, please describe them.

Per Cal. Code Regs., tit. 20, Div. 2, Ch. 5, Appendix B (f) (2), the application's evaluation of a reasonable range of alternatives to the proposed project must include "...[a]n evaluation of the comparative engineering, economic, and environmental merits of the alternatives." Application Section 4.7 provides a description and analysis of a Reduced Project Alternative, while application Sections 4.8 and 4.9 provide a description and analysis of two alternative project sites. After reviewing the alternative descriptions presented in the application, CECs staff has additional questions regarding the Reduced Project Alternative and the Grimmer Road Alternative. The purpose of these questions is to facilitate an evaluation of the comparative engineering, economic, and environmental merits of the alternatives per Appendix B (f) (2).

DR ALT-2. Please provide a figure that illustrates a preliminary site layout for a Reduced Project Alternative. Provide the distance from the BESS enclosures to the nearest sensitive receptor under a Reduced Project Alternative and identify the location of this nearest sensitive receptor.

DR ALT-3. Please provide the following information for the Grimmer Road Alternative Site:

- a. Would the size of the BESS facility under this alternative be the same as the proposed project (i.e., 200 MW)? If a smaller BESS facility would be required under this alternative, describe the estimated size of the alternative BESS facility.
- b. Provide a figure that illustrates a preliminary site layout for the Grimmer Road Alternative Site. Provide the distance from the BESS enclosures to the nearest sensitive receptor under this alternative, and identify the location of this nearest sensitive receptor.
- c. Application Section 4.8 states that "...[t]he Grimmer Road Alternative Site is less desirable than the proposed project

because of its "(i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." However, CEC staff's initial review of this alternative indicates that it would meet the objectives of the proposed project while potentially avoiding or lessening some of the project's potentially significant impacts. Please provide further explanation on how the Grimmer Road Alternative: (1) would fail to meet the basic project objectives, (2) would be infeasible, and (3) would be unable to avoid the project's significant environmental impacts.

BIOLOGICAL RESOURCES

Bald and Golden Eagle: Pursuant to California Code of Regulations, title 20, Section 1704 (a) (3) (B), the application shall include the description of all major studies, including methodologies and findings. Section 3.2.5.1.3 of the application discussed the potential for golden eagle (*Aquila chrysaetos*) and bald eagle (*Haliaeetus leucocephalus*), both designated as state fully protected species (Fish and G. Code, §3511) and protected under the federal Bald and Golden Eagle Protection Act, to occur near the project site. However, the application relied solely on California Natural Diversity Database records, which does not necessarily have the most recent information on bald and golden eagle nesting in the area. As bald and golden eagles are fully protected species under Fish and Game Code section 3511, take of these species generally cannot be authorized. Although Fish and Game Code, section 2081.15 authorizes incidental take of certain fully protected species for eligible renewable energy and infrastructure projects, that authorization does not apply to battery energy storage system (BESS) projects. Therefore, the project must demonstrate that take of bald and golden eagles would be avoided. In addition, if project activities have the potential to disturb or otherwise result in take of bald or golden eagles, authorization under the federal Bald and Golden Eagle Protection Act may be required.

DR BIO-1. Please provide additional information to evaluate the potential for golden eagle and bald eagle to occur within vicinity of the project, and whether the project could potentially result in take of any of these species.

DR BIO-2. Please provide additional data on nesting bald and golden eagles within two miles of the project site (for California Department of Fish and Wildlife (for CDFW review) and up to 10

miles of the project site (for United States Fish and Wildlife Service (USFWS) review), including a detailed habitat assessment, description of the suitability of nesting habitat within the project area and surroundings lands, and results of recent (within the last two breeding seasons) protocol-level survey results within suitable nesting habitat to facilitate an assessment of potential take of eagles from project activities. Information on whether protocol-level surveys have been conducted for known eagle nesting in the area can be determined by contacting local, state, or federal agencies or land managers.

If survey results are not available, then conduct protocol surveys in accordance with the most recent USFWS Updated Eagle Nest Survey Protocol (USFWS 2020). If it is determined that the project has the potential to disturb bald or golden eagle nests, please provide measures to avoid take of nests within two miles of the project, and determine whether an issuance of a permit from the USFWS for eagle nest take under the Bald and Golden Eagle Protection Act is needed.

Incidental Take Permit: Pursuant to California Code of Regulations, title 20, Section 1877 (a), if the applicant is seeking incidental take authorization for state listed or candidate species under the CEC's in lieu permitting authority, the application shall include the information required in California Code of Regulations, title 14, section 783.2(a)(1) to (a)(10). (Cal. Code Regs., tit. 20, § 1877(a).). The California Endangered Species Act (CESA) prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. For purposes of CESA, "take" means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill these species (Fish and G. Code, § 86). The CEC may authorize the take of any such species if the conditions listed in California Code of Regulations, Title 14, section 783.4 subdivisions (a) and (b) are met. Incidental take authorization allows a project owner to take a CESA-listed species if such taking is incidental to, and not the purpose of, carrying out an otherwise lawful activity. The applicant is not currently requesting take coverage for any species. As such, full avoidance would be required to ensure no impacts to state listed or candidate species would occur.

Please note that in the Application Part 1 (TN270250), section 3.2.5.2.1 California Endangered Species Act, the sentence regarding

the listing of insects and invertebrates is incorrect and is recommended to be updated as follows: *Under CESA (Fish and G. Code, §§ 2050- to 2089), state-listed plants receive the same protections as wildlife. While CESA historically excluded insects, a 2022 California appellate court ruling established that certain invertebrates, including four native bumble bee species, can be listed under the definition of "fish." Under CESA, "take," defined as hunt, pursue, catch, capture, or kill, is prohibited for both listed and candidate species, though it differs from the federal Endangered Species Act (FESA) by omitting the terms "harass" and "harm." Incidental take authorization for otherwise lawful activities may be obtained by a project applicant from the CDFW under CESA Section 2081(b), whereas take for educational, scientific, or management purposes is separately authorized under Section 2081(a). For projects seeking Opt-In Certification under AB 205, the CEC serves as the in-lieu permitting authority for incidental take authorization. In consultation with CDFW, the CEC establishes enforceable conditions to avoid, minimize, mitigate, monitor, and fund measures necessary to address impacts to covered species.*

DR BIO-3. Please confirm that the project applicant is not requesting take coverage for state listed or candidate species and instead would implement measures for full avoidance.

Lake and Streambed Alteration Notification: Pursuant to California Code of Regulations, title 20, Section 1877 (a), if the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602 (a) (1) (A)-(F). California Code of Regulations, Appendix B (g) (13) (D) (ii), also requires a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.

The applicant submitted a Lake and Streambed Alteration (LSA) Notification as part of Appendix 3.2D (TN270254). In the "Impacts to River, Stream, or Lake" section of the notification, the applicant stated that the crossing design has not been selected. Potential project impacts cannot be fully evaluated without knowing the crossing type and basic design, such as the footprint of impact and the appropriate avoidance and minimization considerations. Project activities in proximity to the bed, banks, and/or channel of on-site features may result in direct or indirect impacts.

DR BIO-4. Please provide the crossing design for the ditch crossings and any other crossings of potential waters of the state. If one design cannot be selected at this time, please provide the design specifications for each potential crossing design option under consideration. Please identify the preferred option, as available.

DR BIO-5. Please provide a figure showing the delineated aquatic features and related habitats as well as the proposed project design footprint. Please include a table identifying each aquatic feature, temporary and permanent impacts, and types of construction related impacts (e.g. staging, crossing, vegetation removal, etc.), and type of dredge or fill material. Please provide updated GIS shapefiles and data for all mapped resources and temporary and permanent impact areas.

Project Study Area: Pursuant to California Code of Regulations, Appendix B (g) (1), the application shall provide a discussion of the existing site conditions. However, the application provides an inconsistent description of the project area and study area.

The Executive Summary states that the project is located on an approximately 16-acre site on a 47.4-acre property. It is not clear if the gen-tie line is included in these acreages or a separate acreage component. The MNS Engineers, Inc. (MNS) letter reports for Air Quality and Greenhouse Gas states that "*the total project area, including the gen-tie is estimated to be no more than 16 acres.*"

Section 3.2.1, Affected Environment, states that the "*project site (approximately 47 acres) and proposed gen tie area (approximately 1.5 acres) refers to the area that would be physically affected by construction activities associated with the project, including the location of permanent structures (including gen-tie transmission line) as well as staging and other temporary disturbance areas described in Section 2, Project Description. For the purposes of the biological surveys, the Study Area (approximately 49 acres) encompasses the project site parcels, a 100-foot buffer when considering aquatic resources, and the proposed gen-tie area.*"

Additionally, the access road options and gen-tie access road appear to be located outside the study area.

DR BIO-6. Please define the project area and the area surveyed for each biological component (general biological survey, aquatic resources delineation, habitat assessments, etc.). Please clarify the acreage associated with each project component (e.g., gen-tie area, BESS area, and the staging/laydown area) where impacts due to project activities may occur). Please include a table that shows each project component and the total acres associated with that component. Please provide a figure where the project area and biological study area(s) are clearly defined and shows each project component and associated acres. Provide updated GIS shapefiles and data for all project components and mapped resources.

DR BIO-7. Please provide an updated figure that includes the access routes that will be used for the project and the biological survey results associated with those access routes. Please update the natural communities and land use sections to include the access routes and associated acres. Provide updated figures and GIS shapefiles and data for all additional project components and mapped resources.

Impact Analysis: Pursuant to California Code of Regulations, Appendix B (g) (1) and (g) (13) (E), the application shall include a discussion of direct, indirect, and cumulative impacts due to site mobilization, construction, operation, and maintenance of the project, including a discussion of all impacts to biological resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Section 1.3 of the Application, Part 1 (TN 270250), states that night work may be conducted as necessary to meet the project schedule or complete time-sensitive or safety critical work. However, no analysis of impacts to biological resources from nighttime construction noise and lighting is provided.

DR BIO-8. Please provide further details, analysis, and discussion on night work, including the type of activities that may require night work, the duration of those activities, the potential impacts on biological resources (particularly nocturnal species), and mitigation measures that would be implemented to reduce those impacts.

Western red bat (*Lasiurus frantzii*) is a CDFW species of special concern that is known to use foliage in orchard trees as day roosts.

The project site includes suitable roosting habitat for this species however, no analysis of western red bat was included in the application.

DR BIO-9. Please provide an analysis of impacts on western red bats from removal of the orchard trees and proposed mitigation measures that could be implemented to reduce those impacts.

Section 3.2.1.5 (Protected Tree Census) of the application states that the project would be built in an active orchard, but the project would be designed to avoid tree removal.

DR BIO-10. Please clarify how tree removal would be avoided while the project would be built in an active apple orchard. Please provide further details on City of Watsonville Urban Forest and Management Plan and how removal of orchard trees would be consistent with that plan and any other local laws, ordinances, regulations, or statutes regarding tree protection. State the number of trees and species of trees to be removed, if any.

Section 3.2.3 (Cumulative Effects) of the application does not describe the approach used to develop the cumulative setting or any details on the analysis used to reach a conclusion of less than significant impacts.

DR BIO-11. Please provide a more thorough analysis of the cumulative effects of the project within 6 miles, as listed in Table 3-2 and shown in Figure 3-1, that may have a cumulative impact on biological resources, or discuss why the cumulative impact would be less than significant.

The application does not analyze potential impacts from operation of the project on biological resources.

DR BIO-12. Please provide an analysis and discussion on direct and indirect impacts to biological resources as a result of operation of the project, including maintenance activities. The analysis should include, but not be limited to, wildlife access and accidental drowning in stormwater retention basins, night lighting, and avian collisions and electrocutions from utility lines.

It is not clear how the project would impact riparian areas and sensitive natural communities. Section 3.2.1.5 under Protected Tree Census, the application states that "*limited trimming of riparian trees*

may be required." Under Criterion 3.2-2, the application states that *"Direct impacts to riparian habitat and other sensitive natural communities would primarily be associated with construction of project infrastructure, including grading for the BESS facility, installation of the underground gen-tie line, pole installation, wire stringing, and construction of permanent access roads. The project would result in approximately 14.96 acres of permanent impacts and approximately 0.85 acres of temporary impacts to vegetation communities and land cover types within the Study Area (see Table 3.2-2)."* However, later under this criterion, the application states *"No impacts are proposed to riparian or other sensitive natural communities..."*. In addition, Table 2 (Vegetation Communities and Land Cover Types in the Study Area) does not list any sensitive natural communities with a state rank of S1-S3. Table 3.2-2 (Potential Impacts to Vegetation Communities and Land Covers in the Study Area) listed impacts to four different alliance communities, but no riparian community is listed. In addition, the vegetation communities listed in Table 3.2-2 do not match what is listed in Table 2. The community "Unvegetated Wash or Riverchannel" is shown in Table 3.2-2 but is not listed in Table 2.

DR BIO-13. Please clarify potential impacts to riparian and sensitive natural communities as well as all other communities identified in the study area. Please update all relevant tables, including Table 2 and Table 3.2-2, to include all natural communities within the study area and the acres of potential temporary and permanent impacts to each community in redline and strikeout format. Please provide a figure that displays all impacts to natural communities within the study area. Please provide updated GIS data for all mapped resources and temporary and permanent impact areas.

BESS Related Fires: Pursuant to California Code of Regulations, Appendix B (g) (1) and (g) (13) (E) the application is required to include a discussion of expected direct, indirect, and cumulative impacts. A BESS related fire could result in direct and indirect impacts to special-status species and their habitat. BESS fires can result in the release of toxic gases, heavy metals, and persistent organic compounds, which may pose acute and chronic risks to nearby ecological receptors. Recent studies have documented that thermal runaway and subsequent fires at BESS have the potential to release toxic gases and other potentially harmful chemicals that result in localized air and soil contamination. These chemicals have the

potential to result in adverse effects on vegetation, pollinators, amphibians, and aquatic organisms, particularly in sensitive habitats such as aquatic habitats, riparian corridors, and designated critical habitat areas. While some studies have suggested these incidents have not resulted in long-term contamination, the potential for acute exposure and habitat degradation warrants a site-specific analysis.

DR BIO-14. Please provide a detailed assessment of potential impacts to special-status species, habitats, aquatic resources, and critical habitats, in the event of a fire involving lithium-ion or other battery technologies occurring during the operation of the facility. Please evaluate the proximity of the facility to sensitive biological resources, describe potential exposure pathways, and identify mitigation measures or design features that would reduce the likelihood or severity of ecological impacts in the event of a fire. Include a discussion of direct, indirect, and cumulative impacts, the significance level of those impacts, and mitigation measures, as needed, to reduce those impacts.

DR BIO-15. Please describe the types of water and/or fire suppressant that would be used in the event of a battery-related fire, and how those chemicals and waters would be contained and disposed of to avoid impacts to on-site aquatic resources identified in the Aquatic Resources Delineation Report (Appendix 3.2D Attachment D) and off-site aquatic resources such as College Lake.

Species and Habitat Mapping: Pursuant to California Code of Regulations, Appendix B (g) (13) (B) and (B) (i), the application must include a list of species and habitats observed and with potential to occur within 1-mile of the project site and 1,000 feet from the outer edge of linear facilities, and provide detailed maps. Several natural resources and water features that could provide potential habitat for special-status species occur within one-mile of the project site, including College Lake, Pinto Lake, and Corralitos Creek. Staff recommends that research grade iNaturalist observations and eBird occurrences be reviewed for occurrences of special-status species and raptors. CEC staff, in coordination with CDFW staff, located records for tricolored blackbird (*Agelaius tricolor*), white-tailed kite (*Elanus leucurus*), osprey (*Pandion haliaetus*), and bald and golden eagle in the vicinity, and will use this information in our analysis.

DR BIO-16. Please provide a description of species expected to occur, as well as those observed, within 1 mile of the project site and within 1,000 feet of the gen-tie lines. Please provide detailed maps indicating where biological surveys were conducted, including transects, surveys routes, and/or polygons of surveyed area, within 1 mile of the project site and within 1,000 feet of the gen-tie lines. Please include the locations of all state, federal, or other special-status species observed or having known occurrences in the area. Please provide updated GIS data for all mapped resources.

Nitrogen Deposition: Pursuant to California Code of Regulation, Appendix B (g) (13) (B) (ii), the application requires an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates and nitrogen deposition modeling to determine deposition rates and location. The application does not provide any discussion regarding nitrogen deposition, and a formal nitrogen deposition modelling analysis was not conducted. The applicant needs to provide reasoning and discussion on nitrogen deposition or an explanation of why an analysis of nitrogen deposition is not needed. CEC staff consider protected areas and designated critical habitat within a six-mile radius in the analysis of nitrogen deposition impacts from the project.

DR BIO-17. Please provide a discussion as to why the project does not require nitrogen deposition modeling and analysis. If the project does require nitrogen deposition modeling and analysis, provide the following:

- a. Nitrogen deposition modeling results of projected nitrogen deposition rates from operation of the proposed diesel-fueled emergency generator and fire pump. Include the complete citation for references used in determining deposition rates and locations, per Appendix B (g) (13) (C) (ii).
- b. Aerial map of the isopleth graphic depicting modeled nitrogen deposition rates per Appendix B (g) (13) (B) (ii). The geographical extent of the nitrogen deposition map(s) should include the entire plume from the source and a radius of 6 miles from the project site, specifically identifying acres of sensitive habitat(s) within each isopleth. Please provide monitoring parameters, files, and GIS shapefiles.
- c. Amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status

species habitats and vegetation types for wet and dry deposition.

- d. Description of habitat and species potentially affected.
- e. Provide an impact discussion, specifically addressing impacts to sensitive species habitat, per Appendix B (g) (13) (E).

Aquatic Resources: Pursuant to California Code of Regulations, Appendix B (g) (13) (B) (iii), the application shall show any potential jurisdictional aquatic features delineated out to 250 feet from the outer edge of disturbance. Section 3.2.1 of the application (Part 1) (TN270250) states that for the purposes of biological surveys, the Study Area encompassed the project site parcels, a 100-foot buffer when considering aquatic resources, and the proposed gen-tie area. In addition, it is not clear if the 100-foot buffer was applied to the gen-tie line. Figure 5A and 5B do not specify a survey buffer. Pursuant to California Code of Regulations, Appendix B (g) (13) (D) (ii), the application should include the results of the updated delineation and the qualifications of biologists shall be provided.

DR BIO-18. Please update the Aquatic Resources Delineation Report and figures showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance for the project and all related facilities, including the BESS facility site and gen-tie area. The figures should clearly indicate the project boundary and the 250-foot buffer area. Please provide updated GIS shapefiles and data for all mapped resources. Provide the name(s) and qualifications of biologist(s) completing the delineation. Qualifications should include at least two years of applicable experience, including a combination of training and project experience related to delineating aquatic features under federal and state jurisdictions.

Botanical Surveys: Pursuant to California Code of Regulation, Appendix B (g) (13) (D), the application must provide a description and results of all field studies and specialized surveys used to provide biological baseline information about the project; and Appendix B (g) (13) (D) (i) requires biological resource surveys are conducted using appropriate field survey protocols.

Section 3.2.1.8 of the application (TN270250) states that, "*No special-status plant species were observed during the biological reconnaissance, jurisdictional delineation, and California red-legged*

frog and northwestern pond turtle habitat assessment surveys. Formal rare plant surveys consistent with applicable survey guidelines would be conducted during the appropriate blooming periods in 2026 to further evaluate the potential presence of special-status plant species within areas identified as having low potential. Results of these rare plant surveys would be documented in a subsequent technical memorandum." The applicant further concludes that special-status plant species are not expected to occur. However, botanical surveys conducted during the appropriate blooming period were not conducted to verify that no special-status plants occur on the site. As noted in the application, two special-status plant species, Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*) and Santa Cruz tarplant (*Holocarpha macradenia*), have a potential to occur in the project area and have been documented occurring in the region.

DR BIO-19. Please provide the results of the protocol-level surveys for special status plant species, including Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*) and Santa Cruz tarplant (*Holocarpha macradenia*). If no surveys have been conducted, conduct protocol-level botanical surveys during the appropriate blooming period for these species. The botanical surveys should be conducted following the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2021).

Provide a complete survey report documenting the methodology and results of special-status plant surveys conducted. Provide the names and resumes of staff completing the surveys. Resumes should provide experience showing the biologists are qualified to conduct botanical surveys, such as a Bachelor's degree with coursework in plant taxonomy, plant ecology, and plant anatomy; and two field seasons of specialized surveying experience for special-status species in this specific region.

As staff have not received all survey data for special-status plant species, CEC staff may provide additional data requests upon receipt of the requested information.

Floral Resources for Crotch's Bumble Bee (*Bombus crotchii*) and Monarch Butterfly (*Danaus plexippus*): Pursuant to California Code of Regulation, Appendix B (g) (13) (D), the application shall include a description and results of all field studies and

specialized surveys used to provide biological baseline information about the Project; and Appendix B (g) (13) (D) (i) requires biological resource surveys conducted using appropriate field survey protocols. Appendix 3.2A (Special Status Species Potential to Occur Table) (TN 270254) lists Crotch's bumble bee, a state candidate species, as "not expected to occur" because the project site lacks continuous open grassland and floral resources to support this species. However, no habitat assessment or protocol level surveys were conducted, and the site contains floral resources known to be visited by bumble bees. Appendix 3.2A also lists monarch butterfly, a federally proposed threatened species, as not expected to occur but includes monarch as a species observed in Appendix 3.2C (Species Compendium) (TN270254). The application does not document whether the site supports milkweed plants or nectar resources. CEC staff needs additional information on habitat for Crotch's bumble bee and monarch butterfly.

DR BIO-20. Please provide the following:

- Describe the field survey methodology used to assess presence/absence of Crotch's bumble bee and its adequacy to make a determination that take would not occur during site mobilization, construction, and/or operation activities, including during earth moving activities, vegetation removal and mowing, and invasive species management. Information provided should include detail on the locations and acreages of floral resources for Crotch's bumble bee as well as results of protocol level surveys for Crotch's bumble bee. Please describe the methodology as compared to the considerations provided within the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, for more information see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>.
- Describe the field survey methodology used to assess presence/absence of monarch butterfly and its adequacy to make a determination that take would not occur during site mobilization, construction, and/or operation, activities, including during earth moving activities, vegetation removal and mowing, and invasive species management. Information provided should include details on the locations and acreages of floral resources for monarch butterflies and locations of milkweed (*Asclepias*

sp.) plants used for oviposition (egg-laying) and as a larval food source.

Biologist Resumes: Pursuant to California Code of Regulations, Appendix B (g) (13) (D), the application shall include qualifications of biologists conducting the survey(s). The applicant's biologists conducted multiple surveys to support the Biological Resources section of the application (Part 1) (TN 270250). However, the resumes provided do not match the individuals mentioned in the report, or do not provide enough information to determine the biologists' qualifications to conduct the surveys. For instance, page 3.2-8 of the application states that Emily Scricca conducted the formal habitat assessment for California red-legged frog and northwestern pond turtle, but the California Red-Legged Frog Habitat Site Assessment Data Sheets in Appendix 3.2F list Tara Johnson-Kelly and Jared Davis. Resumes for these individuals are not provided.

DR BIO-21. Please provide updated resumes for all personnel who conducted the biological resources surveys in support of the application, including experience conducting habitat assessments, species surveys, and aquatic delineations. Resumes should provide enough experience showing the biologists are qualified to conduct the applicable surveys, such specialized training and two field seasons conducting similar work in the region. For individuals conducting species-specific habitat assessments, the resumes should indicate the amount of time spent performing species-specific surveys or monitoring (e.g., hours or days), number and life stages observed in the field, and references (i.e., contact information for individual(s) that can verify the experience in question and the total time served on each project, who are not employed with the same organization the surveyor currently works for).

Compensatory Mitigation for Aquatic Resources. Pursuant to California Code of Regulations, Appendix B (g) (13) (F) (ii), the application shall include all off-site habitat mitigation and identification of appropriate agency contacts for coordination and verification. Criterion 3.2-3 of the application (TN 270250) states that, *"Compensatory mitigation for permanent impacts to jurisdictional waters would be provided at a minimum 1:1 ratio (or higher, as required by permitting agencies), through the purchase of approved mitigation bank credits or an agency-approved turnkey mitigation*

project.” However, the application did not identify the type of mitigation that would be used. Though several options were suggested under MM-BIO-6 (mitigation bank credits or through an agency-approved turnkey or permittee-responsible mitigation project), details associated with those options, or appropriate agency contacts, were not provided.

DR BIO-22. Please provide a more detailed description of proposed compensatory mitigation for the drainage ditch to fully offset impacts of the project. Please provide further details on the mitigation options proposed (names and locations of mitigation banks or turnkey or permittee-responsible mitigation projects), personnel contacted, and any associated correspondence.

Agency Correspondence: Pursuant to California Code of Regulation, Appendix B (g) (13) (H), the application shall include copies of any preliminary correspondence between the project applicant and state and federal resource agencies; and Appendix B (i) (2) requires the name, title, and contact information for any official contacted at each agency.

Section 3.2.6 of the application (TN 270250) states that an Approved Jurisdictional Determination (AJD) request has been submitted to the U.S. Army Corps of Engineers (USACE). However, a copy of the AJD request was not provided.

Section 3.2.7 provides agency contacts for CDFW and USFWS but does not provide names and titles of the agency representatives contacted. Furthermore, no contact information was provided for the USACE, and copies or summaries of agency correspondence were not provided.

DR BIO-23. Please provide copies of all correspondence between the project applicant and any state and/or federal resource agencies, including the names, titles, and contact information for agency representatives contacted, if not otherwise provided in the application.

DR BIO-24. Please provide a copy of the Aquatic Resources Determination request submitted to the U.S. Army Corps of Engineers (USACE) and any correspondence between the project applicant and the USACE related to the request.

Local Ordinance Requirements: Pursuant to California Code of Regulations, Appendix B (i) (1) (A), the application shall include a table that identifies conformance with laws, regulations, ordinances, and standards. The application states under Criterion 3.2-5 that the project would comply with all applicable setback requirements under Santa Cruz County Code 16.32 through incorporation of setbacks to riparian features. In Table 3.2-4. LORS Applicable to Biological Resources, the applicant lists local Santa Cruz County Codes, including riparian corridor setbacks. However, the application does not discuss what the riparian setback requirements are or how they conform to those requirements. As described in **DR BIO-13**, the application does not clearly explain how the project would impact riparian areas.

DR BIO-25. Please describe the riparian setback requirements under Santa Cruz County Code and explain how the project would comply with those setback requirements.

REFERENCES

California Department of Fish and Wildlife (CDFW). 2021. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. March 20, 2018. Revised February 3, 2021. Available online: <https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>

U.S. Fish and Wildlife Service. 2020. Updated Eagle Nest Survey Protocol. April 21, 2020. Available online: <https://www.fws.gov/media/updated-eagle-nest-survey-protocol>

CULTURAL AND TRIBAL CULTURAL RESOURCES

The California Code of Regulations, title 20, section 1704(a)(3)(C) requires a "list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference." Section 3.3, Cultural Resources, of the application provides this information mainly through numerous in-text citations and corresponding entries in a dedicated References subsection. The References subsection does not contain entries for all sources of information that are cited in Section 3.3 and the Confidential Technical Study.

DR CUL/TRI-1. Non-Confidential Cultural Resources Report (CEC staff is treating this as application section) and the Confidential

Cultural Resources Report both contain the in-text citation (Whistler 1977) without full reference provided. Please provide the full bibliographic information for Whistler 1977.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(1), requires the applicant to address the potential for the cumulative impacts of construction and operation of the project.

DR CUL/TRI-2. The application does not address the potential for the cumulative impacts of construction and operation of the project. Please update the application section to include a cumulative impacts analysis.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(2)(B), requires the applicant provide copies of all California Department of Parks and Recreation (DPR) 523 forms for all cultural and tribal cultural resources identified and a copy of all previously conducted reports identified in the record search whose survey coverage is wholly or partly within 0.25 miles of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.

DR CUL/TRI-3. The application does not include copies of site records or reports identified in the record search results. Please provide a copy of all California Department of Parks and Recreation (DPR) 523 forms for all cultural and tribal cultural resources identified and a copy of all previously conducted reports identified in the record search whose survey coverage is wholly or partly within 0.25 miles of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.

Please include the below studies from within the project area:

- S-011495
- S-030661
- S-039867
- S-039867a
- S-043578

Please include the following archaeological excavation reports and architectural surveys:

- S-004056

- S-004056a
- S-004056b
- S-004097
- S-008675
- S-010642
- S-011441
- S-021513a
- S-025521
- S-027282
- S-033090
- S-038430
- S-040310
- S-042667
- S-046733
- S-046733a
- S-046733b
- S-051077
- S-053567
- S-053567a
- S-054133
- S-054477
- S-055803
- S-055815
- S-057305

Additionally, please provide any missing archaeological survey reports from within 0.25 miles of the project area.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(2)(B), requires a "copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided."

DR CUL/TRI-4. The confidential technical study does not include an appropriate map showing all past survey coverage. Please provide a 1:24,000 USGS topographic map showing all past survey coverage with CHRIS identifying numbers.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(2)(C), requires the results of a new cultural resource survey, or survey of less than 5 years old shall be provided. New

pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending no less than 200 feet around the project site, substations, and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes. New Historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5 miles out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field reconnaissance ("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age.

DR CUL/TRI-5. The pedestrian survey of the project area did not include survey of the gen-tie route, gen-tie access route, or the three alternative access roads shown in Application Section 1 TN 270250, Figure 1-3, plus 50-foot buffer on these linear features. Additionally, several built environment linear features such as roads and power lines were not surveyed or evaluated as part of the pedestrian survey, with some such as Green Valley Road dating to before 1889. Please update the application section and confidential technical study with complete archaeological and built environment surveys, evaluations and appropriate buffers accordingly. Please also provide additional overview photos of the project area, previously and newly identified built environment resources, and linear features in the confidential technical report.

The California Code of Regulations, title 20, Section 1704(b)(2), Appendix B, requires a map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii).

DR CUL/TRI-6. Please provide a map depicting the locations of all previously known and newly identified cultural and tribal cultural resources, as specified above, under confidential cover. The map must be at a scale of 1:24,000 and use USGS topographic base imagery.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B (g) (2) (D) (i), requires applicants to provide a copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity.

DR CUL/TRI-7. Although Appendix E of the Confidential Cultural Resources Report contains the NAHC's response to the applicant's request for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, Appendix E does not contain a copy of the applicant's request to the NAHC. Please provide a copy of the request.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g) (2) (D) (ii), requires the applicant to provide a copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.

DR CUL/TRI-8. Section 6.3 of the Confidential Cultural Resources Report describes the applicant's outreach to California Native American tribes as including letters to all individuals on the NAHC-provided contact list. This section also states that all correspondence with California Native American tribes is contained in Appendix E. Appendix E, however, contains one email from the applicant's consultant to one tribal contact, and an email response from a different tribal contact. Appendix E does not contain any of the applicant's mailed letters to California Native American tribes. Please provide this correspondence and any additional email correspondence, if applicable.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(g)(2)(E)(iii), requires a discussion of educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.

DR CUL/TRI-9. The application section does not include a measure for Worker Environmental Awareness Training. Please update the application section to include details of education programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(i)(1)(A), requires a table that identify laws, regulations, ordinances, standards, adopted local, regional, state and federal land use plans, leases and permits applicable to the proposed project and a discussion of the applicability of, the conformance, with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

DR CUL/TRI-10. Although the application section provides a narrative discussion of applicable laws, regulations, ordinances, and standards (LORS), the discussion neither tabulates nor does it explain the proposed project's conformance with each. Please provide a table or tables that explains the proposed project's conformance with LORS and reference pages in the application where conformance with LORS during construction and operation is demonstrated.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(i)(1)(B), requires a table that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.

DR CUL/TRI-11. The application does not include information about outside agency jurisdiction. Please update the application section to include a table that identifies each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards and adopted local, regional, state, and federal land use plans, and agencies which would have permit approval or enforcement, as applicable as well as the name, title, phone number, address and email address of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for CEC staff.

The California Code of Regulations, title 20, section 1704(b)(2), Appendix B(i)(3), requires a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

DR CUL/TRI-12. The application section does not include a schedule of when any needed permits will be obtained. Please update the application section to include a schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

The assessment of potential impacts on cultural and tribal cultural resources relies, in part, on understanding the extent and nature of the ground-disturbing activities associated with a proposed project. The application does not provide any detail as to the depth of excavation anticipated for construction of the project. It is not clear that the estimated excavation depths described incorporate all proposed construction elements of the project or if it is only describing the grading of the BESS equipment yard.

DR CUL/TRI-13. Neither the application section nor the confidential technical study provides information about maximum proposed ground disturbance. Please provide the maximum depth of ground disturbance for each project component proposed, inclusive of project construction and operation.

EXECUTIVE SUMMARY

Requirements contained in Appendix B (a) (1) (E) specify that a list of current assessor's parcel numbers and owners' names and addresses within 500 feet of the proposed transmission line and within 1,000 feet of the proposed project site need to be provided, along with a map. Appendix A of the application contains the mapped exhibit and accompanying list of names and addresses; however, CEC staff is requesting supplemental accompanying graphical files to facilitate data production.

DR ES-1. Please provide a comprehensive set of GIS shapefiles corresponding to parcels associated with the list of parcels within the 1,000-radius of the project site that will assist CEC staff in developing public outreach.

GEOLOGIC HAZARDS

The preliminary geotechnical report conducted by Haley Aldrich included in Appendix 3.4a has analyzed some of the criteria necessary to characterize the impacts of the project but leaves out important information. In particular, there was no Seismic Design Criteria

specified. According to the data provided in Appendix 3.4a, which was also verified by using the USGS seismic mapping tool (seismicmaps.org), the MCE Ground Motion value S_1 that is used to determine the Seismic Design Criteria is 0.859g. The report also states that the Risk Category is III, however, this contradicts the Interpretation of Regulations IR N-3 from the Division of the State Architect that states in section 1.2.1.1: "The Risk Category shall be IV for the BESS structure and the internal components plus equipment due to the quantity of hazardous (toxic and flammable) materials. The seismic importance factor (I_e and I_p) shall be 1.5."

Referencing ASCE 7-22 section 11.6, these values would assign the project structures a Seismic Design Category of "F". Section 11.8.1 states that "A structure assigned to Seismic Design Category E or F shall not be located where a known potential exists for an active fault to cause rupture of the ground surface at the structure."

CEC staff acknowledges the report authored by Bayside Geology that looked for direct evidence of active faults at the site. This report will be considered in the CEC risk analysis, but it remains unclear if this report alone can negate the "known potential" for fault rupture to occur at the site.

DR GEO-1. Please determine what Seismic Design Criterion applies to the project according to ASCE 7-22.

DR GEO-2. Please provide additional analysis and discussion on how the project would comply with the 2025 California Building Code, ASCE 7-22, and IR N-3 with regard to the project being located directly on a known Holocene active fault.

DR GEO-3. Please identify the specific data references used on the geologic and mineral maps, Figures 3.4-1 through 3.4-5.

Section 3.11.1.3 of the application characterizes the expansion potential of soils at the site as "low to moderate". In contrast, the preliminary geotechnical investigation (Appendix 3.4a section 6.3) characterizes the expansion potential of the site as moderate to high due to clay that underlies the site that was tested to have high expansion potential.

DR GEO-4. Please amend the analysis for the Geologic Hazards (3.4) and Soils (3.11) section of the application to include the

conclusions of the preliminary geotechnical investigation (Appendix 3.4a) for expansive soils. Include a discussion on the effects of grading that is likely to occur due to the slope of the site and what soils are expected to be exposed as a result. Also please include any mitigations that would be implemented to account for expansive soils.

GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)

To help meet hydrofluorocarbon (HFC) reduction goals, California adopted Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses. The current Cal. Code Regs., tit. 17, § 95375(c)(1) states that no person shall sell, lease, rent, install, use, or otherwise enter into commerce in the State of California any end-use equipment or product manufactured after the effective date that does not comply with Table 3 (which includes non-residential air conditioning equipment) of section 95374(c), with exceptions stated under section 95375(c)(2).

In order to bring a BESS facility into compliance, project owner must demonstrate either (1) compliance with the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Airconditioning and Other End-Uses (California Code of Regulations (CCR), Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4, Subarticle 5, Sections 95371, et seq.), or (2) possession of an effective approved variance pursuant to CCR, Title 17, Sections 95378 from the California Air Resources Board (CARB) or (3) reliance upon the May 4, 2026 notice of temporary relief (CARB Enforcement Notice: HFC Regulation and Battery Energy Storage Systems [BESS]) from CCR, title 17, section 95375 until January 1, 2028 issued by the California Air Resources Board.

In Section 5, pages 11 through 12, of the Greenhouse Gas Assessment (TN 270250), the applicant states that "the project would not use refrigerants with GWPs higher than 750 for the cooling system", but does not elaborate on the design of the cooling system or the refrigerant that would be used in the cooling system. In addition, the use of an existing residential building is discussed but there is no description of whether there is an installed air conditioning unit.

To ensure that the chosen BESS cooling system and refrigerant would comply with Cal. Code Regs., tit. 17, § 95375(c)(1), CEC staff requests the following information.

DR GHG-1. Please provide a description of the cooling system design for the battery energy storage system and confirm or provide the identity of refrigerant(s) that the BESS cooling system will use.

DR GHG-2. Please provide an estimate of annual refrigerant leakage, reported as carbon dioxide equivalent (CO₂e) emissions, from the cooling system proposed for the project.

DR GHG-3. Please demonstrate how the use of any refrigerant(s) proposed for BESS cooling would comply with the HFC prohibitions, the possession of a variance, or reliance upon the CARB May 4, 2026, notice of temporary enforcement relief. If not, please propose an alternative refrigerant, and provide updated annual refrigerant leakage estimates, reported as carbon dioxide equivalent (CO₂e) emissions, associated with the newly proposed refrigerant.

DR GHG-4. Please confirm whether any refrigerant would be used for cooling of the existing building. Please provide the specifications if any refrigerant would be used on the building, including GHG emissions calculation due to refrigerant leakage.

CEC staff needs to better understand the direct and indirect GHG emissions associated with the BESS. Since battery performance degrades over time and gradually decreases round-trip efficiency, staff expects that battery augmentation would be performed to offset battery degradation and to maintain project performance commitments, leading to an increase in auxiliary loads. Twenty-one enclosures would be added for future augmentation to compensate for performance degradation of the batteries.

As stated in Section 5 of the application, the project would consume approximately 14,817 MWh of electricity per year for auxiliary loads under the most conservative assumption. In addition, the energy capacity of the batteries is estimated to degrade by approximately 1.6 percent per year, resulting in approximately 12.8 MWh energy degradation per year. Assuming 365 full charging cycles per year and 15 percent energy losses during transmission and battery charging cycles, the project would result in approximately 43,800 MWh of energy loss per year. In total, the project would result in approximately 58,630 MWh of electricity consumption from auxiliary

loads, degradation, or loss per year. This number was input into CalEEMod to calculate energy source emissions.

CEC staff will also need the annual indirect GHG emissions associated with the grid power used to charge the BESS. Staff needs to know the indirect GHG emissions associated with charging from the electrical grid and the carbon intensity value used to derive the indirect GHG emissions associated with grid charging. CEC staff also needs to know the displaced GHG emissions from the BESS discharging to the grid.

CEC staff needs the spreadsheet file(s) of the emissions calculations with live, embedded calculations to complete the analysis.

DR GHG-5. If the BESS would be charged by the grid, please calculate the indirect GHG emissions (metric tons of CO₂e) associated with charging from the grid and displaced GHG emissions with discharging to the grid. Provide assumptions for the number of hours annually that the BESS could be charged by the grid, the GHG emission intensity factor from the electrical grid during charging and discharging considering carbon neutrality by 2045, and the efficiency degradation over the project lifetime in the calculation of indirect GHG emissions.

DR GHG-6. Please provide a copy of the spreadsheet file(s) containing the emissions (metric tons of CO₂e) and energy calculations performed for energy losses due to transmission and charging/discharging cycles, and auxiliary loads, such as BESS cooling, and **DR GHG-5** with live, embedded calculations. In all scenarios, please include assumptions that account for the BESS efficiency degradation over the project lifetime in the calculation of indirect GHG emissions.

According to the Regulation for Reducing Greenhouse Gas Emissions from Gas-Insulated Equipment (California Code of Regulations, title 17, sections 95350 through 95359.1) starting on the applicable phase-out dates, no person may acquire SF₆ gas-insulated equipment (GIE) for use in California unless certain provisions are met.

In the application, it is stated that the project would use vacuum or air-insulated switchgear and would not use SF₆ for the substation equipment complying with California Code of Regulations, title 17, sections 95350 through 95359.1.

DR GHG-7. Please confirm whether the switchgear would be vacuum or air-insulated.

DR GHG-8. Please provide specifications/description of the system design for switchgear insulating medium selected.

HAZARDOUS MATERIALS HANDLING

California Code of Regulations, title 20, Appendix B (g) (10) (A) requires a list of all materials used or stored on site, including discussion of toxicity of each material, which are hazardous or acutely hazardous as defined in California Code of Regulations, title 22, § 66261.20 et seq. Additionally, Appendix B (g) (10) (C) requires a discussion of the storage and handling system for each hazardous material used or stored at the site.

TN270250 Section 3.5.1.2 (Page 3.5-5) of the Application discusses hazardous materials to be used during project construction, operations and decommissioning. For example, Subsection 3.5.1.2.1 (page 3.5-6) briefly discusses hazardous materials used during construction (gasoline, diesel fuel, oils, lubricants, solvents, detergents, degreasers, paints, ethylene glycol, dust palliatives, herbicides, and welding materials/supplies). While the application mentions the hazardous materials in the text, it does not provide a comprehensive listing of all chemical substances and hazardous materials that would be used during the construction and operation phases of the project.

DR HAZ-1. Provide a table list of all hazardous materials to be used or stored on site during construction and operation of project. At a minimum, the table should list the individual chemical or material and include information on its use, estimated quantities, storage information including location and container information, and toxicity.

California Code of Regulations, title 20, Appendix B (g) (10) (F) requires a discussion of measures proposed to reduce the risk of any release of hazardous materials. As stated in the Application (TN270250 - Project Description, Section 2.3.1.10), "an existing residential structure located near the northwestern side of the project site along Minto Road would be used as an office space for the BESS." The Application (TN270250 - Hazardous Material Handling, Criterion 3.5-2) states that, "existing structures, due to their age, are likely to contain asbestos." However, Criterion 3.5-2 (page 3.5-11) also states that the

proposed project does not anticipate demolition or disturbance of the on-site buildings, and as such emission or release of the hazardous building materials would not likely occur.” There appears to be a discrepancy between the Project Description and the analysis in Criterion 3.5-2 regarding reuse of the existing residential structure. If the residential building is redeveloped as an office, it would likely disturb asbestos containing materials (ACM) and lead based paint (LBP), if present, during remodeling.

DR HAZ-2. Please resolve the apparent discrepancy between the Project Description and Section 3.5 (Criterion 3.5-2) regarding the redevelopment of the existing onsite residence as an office for the BESS. If redevelopment of the existing residential structure is proposed, describe the scope of the building remodel and provide the results of an ACM/LBP site survey that describes the occurrence and locations of ACM and LBP materials, and potential quantities of ACM/LBP materials that would be disturbed and that would require hazardous material handling and disposal.

California Code of Regulations, title 20, Appendix B (g) (10) (G) requires a discussion of the fire and explosion risks associated with the project. TN270250 Subsection 5.5.2.5.1 of the Application does not adequately discuss potential impacts of lithium battery fires during transportation of lithium batteries to the project site. The project would increase the potential for accidents involving lithium batteries being transported to the project site. Recent semi-truck accidents involving lithium batteries have resulted in the shutdown of I-80 near Nyack and I-15 near Baker.

DR HAZ-3. Please provide a discussion of actions that the project would implement to reduce the probability of lithium battery fires during transportation of batteries to and from the project site and actions to reduce the impact of such fires (if they occur) to motorists and nearby sensitive receptors.

LAND USE AND AGRICULTURE

In Section 3.6 of the application, the analysis of impacts on agricultural resources includes a citation to an agriculture feasibility report prepared by Rush & Duttie Consulting. The report reference does not provide information on where the document is available.

DR LAND-1. Please provide a copy of the 2024 report prepared by Rush & Duttie Consulting, *Agricultural Land Assessment of APN 051-101-77 and 051-101-78, 90 Minto Road, Watsonville, California.*

Under the Appendix G checklist of the CEQA Guidelines, "Land Use and Planning" criterion "b" asks whether a significant environmental impact could occur due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigation an environmental effect. To answer this checklist question, the key task is to discuss and evaluate whether a potentially significant impact could occur due to such a conflict. Under criterion 3.6-2 of the Land Use analysis in the application (criterion "b" in the checklist), there are voluminous lists of policies in tables and brief comments on whether there are conflicts with the applicable policies, but almost no analysis on whether a significant impact could occur due to an inconsistency.

In Section 3.6 of the application, Table 3.6-3, "Policy BE-1.1.4 (LCP) Siting New Development," requires locating new development "near existing developed areas...where development will not have significant adverse effects on agricultural land or natural resources." The conclusion in the application states that the project is consistent with this policy because it is near existing developed areas without providing any discussion addressing potential impacts on agricultural or natural resources, even though the site is on agricultural land and is adjacent to at least one natural resource area (College Lake).

The northern boundary of the proposed BESS site is approximately 400 feet from College Lake, which is the subject of the *College Lake Integrated Resources Management Project, Adaptive Management Plan 2022*. The plan was developed by the Pajaro Valley Water Management Agency to fulfill mitigation requirements in two EIRs, other regulatory requirements, and related plans. Section 3.6 of the application does not assess conformity of the proposed project with the 2022 Adaptive Management Plan. And the project is not included in Section 3 of the application under "Cumulative Projects" or in Tables 3-1, 3-2, or Figure 3-1. Information on the "College Lake Integrated Resources Management Project" is available at this website: <https://www.pvwater.org/college-lake-project>

DR LAND-2. Please add to the conclusion for "Policy BE-1.1.4 (LCP) Siting New Development" (Table 3.6-3) to provide an

assessment of whether the proposed project could cause potentially significant adverse impacts on agricultural land (e.g., conversion of agricultural land to a nonagricultural use). For impacts on natural resources, please provide cross references to subsections in the application where impacts are evaluated, including Biological Resources, pursuant to California Code of Regulations, Appendix B. Please change the summary conclusion to “applicable and inconsistent.”

DR LAND-3. Please provide an assessment of the proposed project’s consistency with the purpose and management objectives of the *College Lake Integrated Resources Management Project, Adaptive Management Plan 2022*. Please justify conclusions. Please add this project to “Cumulative Projects” in Section 3 of the application and provide information on its status.

And in Table 3.6-3, “Policy ARC-1.1.2 (LCP) Types of Agricultural Resource Lands,” the policy lists specific agricultural land type designations for parcels identified as commercial agricultural land. It also mentions maintaining “by County ordinance specific agricultural land type designations....” The policy refers to criteria set forth in the General Plan and LCP Land Use Plan, but there is no discussion of the designation for the area where the project site is situated and no assessment of whether the project might conflict with the intention of the County to maintain certain agricultural land types.

DR LAND-4. Based on the County’s inventory of agricultural land type designations listed under Policy ARC-1.1.2 (LCP) in Table 3.6-3, please discuss the project site location relative to the referenced Agricultural Resource Maps. Please describe project consistency with the land type designation for the project site. Please reference any applicable County ordinance and discuss potential actions needed to achieve consistency.

The policies listed in Table 3.6-3 include several mentions of the Urban Services Line (USL) and Rural Services Line (RSL) in the County. The summary conclusion for “Policy ARC-5.2.13 (LCP) Utility Service Lines” states that the project “is not a residential or commercial development within the Urban Services Line.” CEC staff has found no other discussion in Section 3.6 on the project site location relative to the USL and RSL and what that might mean in terms of the County's intentions and plans for land uses in those areas.

DR LAND-5. Please describe the project site location relative to the USL and RSL and what that means in terms of the County's intentions and plans for land uses in those areas and whether the project would be consistent.

It is stated in the application that the project would comply with applicable public safety standards in part by "ensuring 100-foot setbacks from public roads and adjacent parcels (excepting the substation)...." CEC staff reviewed Figure 3.6-2, "Assessor's Parcel Number (APN) Map," and compared the development area and project site/parcel boundary to Google Earth imagery; the image comparison shows that portions of the BESS development area are within approximately 50 feet of the project site boundary along Minto Road.

DR LAND-6. Please clarify setback distances for all parts of the project site. Please provide a revised site plan on an aerial photo base map showing planned setbacks.

Subsection 3.6.2 discusses "Conformity with the Watsonville Airport Land Use Compatibility Plan." Table 3.6-5 summarizes project consistency with airport policies. The discussion and table acknowledge that the project site is in the airport influence area (AIA). There are multiple policies listed in Table 3.6-5 with brief statements on consistency but no discussion documenting how the project would comply with applicable development standards for projects in the AIA. In the column labeled "Community Wide Standards" conclusions are unsupported for the following key items: "BE-5.4.2 (LCP) Airport Land Use Compatibility," "BE-5.4.10 (LCP) Airspace Obstructions," "BE-5.4.11 (LCP) Wildlife and Other Hazards to Flight," "BE-5.4.12 (LCP) Deed Recordation Acknowledging Aircraft Overflight," and "BE-5.4.17 Military Considerations."

DR LAND-7. Please add to the conclusions for "BE-5.4.2 (LCP) Airport Land Use Compatibility," "BE-5.4.10 (LCP) Airspace Obstructions," "BE-5.4.11 (LCP) Wildlife and Other Hazards to Flight," and "BE-5.4.12 (LCP) Deed Recordation Acknowledging Aircraft Overflight" to provide details on how compliance would be achieved. For item "BE-5.4.17 Military Considerations" the conclusion is "not applicable" with no supporting documentation. Please revise the table to support and justify conclusions. (See also **DR LAND-8.**)

CEC staff has found no discussion in the application on whether the project site is located within 1,000 feet of a military installation, within military special use airspace, or beneath a military low-level flight path (required per Public Resources Code Section 25519.5). If the site is within such an area, it would be necessary to notify the Department of Defense (DOD) Military Aviation and Installation Assurance Siting Clearinghouse of the project plans. Information and resources on military services coordination are available on the Governor's Office of Land Use and Climate Innovation website (formerly the Governor's Office of Planning and Research): <https://lci.ca.gov/planning/land-use/military-affairs/>

DR LAND-8. Please provide an assessment to determine the project's compatibility with California military land uses and military operations. Please determine whether notification of DOD would be necessary. If the project could affect military operations or airspace, please provide details on when notification of DOD will occur.

Table 3.6-6 summarizes project impacts on Farmland, based on California's Farmland Mapping and Monitoring Program. A table footnote states that a 30-foot-wide trench corridor was examined to allow siting flexibility for the underground trenched portion of the generation tie (gen-tie) line. There is no explanation of what it means that the "trench corridor was examined" or whether the potential disturbance area for construction of the gen-tie line is included in the acreage that could be temporarily or permanently disturbed by the project.

DR LAND-9. Please clarify whether the 30-foot-wide trench corridor is part of the potential disturbance area for project construction. Please add data on temporary disturbance areas during construction to Table 3.6-6 and differentiate acreages for temporary and permanent impacts on Farmland. Please delineate temporary disturbance areas (e.g., the potential construction corridor for the gen-tie line) and add them to the revised site plan requested under **DR LAND-6**.

NOISE AND VIBRATION

The application evaluates construction noise at residential noise-sensitive receptors R1 through R4. Table 3.7-5 of the application identifies the highest predicted construction noise levels at R1 and R2

as 73 dBA L_{eq} and 75 dBA L_{eq} , respectively, during civil work and grading construction phase. The existing daytime ambient noise level at both R1 and R2 is approximately 45 dBA L_{eq} . Therefore, civil work and grading would increase noise levels by approximately 28 dBA at R1 and 30 dBA at R2. In addition, other construction activities, including site preparation and battery enclosure installation, would also result in elevated noise levels above ambient conditions at R1 and R2.

The application concludes that construction noise impacts would be less than significant because predicted construction noise levels would not exceed the Federal Transit Administration daytime construction noise threshold of 80 dBA L_{eq} . The application also compares predicted construction noise levels to the Santa Cruz County General Plan Noise Element recommendation that mitigation be employed when average construction noise levels exceed 75 dBA L_{eq} at existing residences. However, construction noise impacts are not determined solely by comparison to a fixed numerical threshold. Construction noise impacts also depend on the increase above existing ambient conditions, the affected receptor, the type and duration of construction activity, and the availability of feasible measures to reduce the impact.

California Code of Regulations, title 20, Appendix B (g) (1) requires a discussion of the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Based on CEC staff's experience with community reaction to construction noise, an increase of 10 dBA or more during daytime hours can trigger community reaction and may require additional measures to address impacts. A 10 dBA increase generally corresponds to a doubling of perceived loudness. The application indicates that construction noise at R1 and R2 during Civil Work and Grading would be approximately 28 dBA and 30 dBA above ambient conditions, respectively, which is substantially greater than the level at which community reaction may occur. Because R1 and R2 are nearby residential receptors adjacent to the project site and would be exposed to elevated construction noise during multiple construction activities, the applicant needs to evaluate construction noise mitigation measures to reduce construction noise levels at R1 and R2.

DR NOISE-1. Please provide an evaluation of feasible construction noise mitigation measures for receptors R1 and R2 during construction activities that would result in an increase of more than

10 dBA above existing daytime ambient conditions. The evaluation should identify a feasible measure or combination of measures. Measures evaluated may include, but are not limited to, temporary construction noise barriers, acoustic shielding, equipment relocation, construction staging controls, use of electric-powered construction equipment instead of diesel-powered equipment where feasible, or scheduling restrictions for the loudest equipment or activities. For each mitigation measure evaluated, please provide:

- A description of the measure;
- The estimated construction noise level at R1 and R2 with the measure implemented; and,
- The expected noise reduction in dBA.

PROJECT DESCRIPTION

As required under Appendix B (b) (2) (A), applicants must provide maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) depicting each proposed transmission line route and showing settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s). Although the current Figure 2-2 depicts the project's single overhead gen-tie route, the figure is zoomed out too far to show the level of detail necessary to identify these features.

DR PD-1. CEC staff requests that Figure 2-2 be repackaged as a scaled 8½ x 11-inch figure depicting the gen-tie line from the point of change of ownership (POCO) to the point of interconnection (POI) at the Green Valley Substation. The revised figure shall identify settled areas, parks, recreational areas, scenic areas, and existing transmission lines within 1,000 feet of the Green Valley Substation. Staff recommends retaining the current Figure 2-2 as an inset within the new primary figure to preserve broader project context.

As required under Appendix B (b) (2) (B), applicants must provide a full-page color photographic reproduction depicting a representative above-ground section of the transmission line route prior to construction, along with a full-page color photographic simulation of that same section after construction. The pre- and post-construction aerial views provided in Figures 1-4 and 1-5 do not show sufficient detail of the proposed gen-tie alignment to satisfy this requirement.

DR PD-2. Please provide a full-page color photographic reproduction depicting a representative view of the Minto Road streetscape, from a vantage point looking east toward the BESS site adjacent to the Green Valley Substation, showing the pre-project condition. From the same vantage point, provide a corresponding full-page color photographic simulation depicting the post-construction condition, including the above-ground portion of the gen-tie line from the POCO to the POI within the Green Valley Substation.

As required under Appendix B (b) (2) (C), applicants must provide a detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.

DR PD-3. Please see **DR TSD-2, 3, 4, and 5** for further explanation on the request to provide such details.

As per the requirements of Appendix B (b) (2) (E), a completed System Impact Study (SIS) prepared by the California Independent System Operator (California ISO) is required. These interconnection studies ensure the interconnecting grid meets the California ISO reliability standards. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards.

DR PD-4. Please see **DR TSD-1** for details on the request to provide the SIS Interconnection Study report.

PALEONTOLOGICAL RESOURCES

It was stated by the Sant Cruz Natural History Museum that they did not have records for the Seahawk site area and to query the University of California Museum of Paleontology instead. No documentation was provided that a query of the California Museum of Paleontology was conducted. CEC staff needs the results of the query to complete its analysis of the project application.

DR PALEO-1. Please request the paleontological records from the University of California Museum of Paleontology for the project area and submit the results to CEC staff.

PUBLIC HEALTH

LORS Table

Appendix B (i) (1) (A) of the Cal. Code Regs., tit. 20, Div. 2, Ch. 5, require that an application include “tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed”.

The applicant does not provide a table or matrix in the public health section (Section 3.9) of the application (TN 270248), that describes the applicable public health laws, ordinances, regulations, and standards or how the project will conform with each of them.

DR PH-1. Please provide a table that identifies public health-related laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

BESS Enclosure and Vent Information

Subsection 5.2 of Section 3.9 of the application (TN 270248) includes an analysis of the Operational Thermal Runaway Impacts. CEC staff needs additional information regarding the BESS enclosures and vents to complete the analysis.

DR PH-2. Please include the locations and sizes of the vents on the BESS unit. Additionally, please provide detailed BESS unit drawings showing dimensions, vent locations and sizing.

SOCIOECONOMICS

California Code Regulations, title 20, section 1704, (a) (3) (C) requires a list of literature relied upon or referenced in the document, along with brief discussions of the relevance of each such reference.

DR SOCIO-1. For any literature used or referenced for the application's socioeconomic analysis, please list the references and describe the relevance of each such reference.

Appendix B (g) (1) requires a discussion of the existing site conditions, including the cumulative impacts due to construction, operation, and maintenance of the project. The discussion of cumulative impacts and the approach used to develop the cumulative setting was not included in the application.

DR SOCIO-2. Provide a discussion of the cumulative impacts due to the construction and operation and maintenance of the project.

Appendix B (g) (7) (A) (iv) requires the provision of the availability of skilled workers by occupation required for construction and operation of the project. The application states that project construction would directly support 50 construction jobs and five operation workers. CEC staff needs additional information with greater detail on the occupations needed for the construction and operation workforce.

DR SOCIO-3. Provide a table with the occupations required for construction and operation and the number of workers available in the needed occupations.

Appendix B (g) (7) (A) (vi) requires capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities.

The application does not include information on the public services (law enforcement, fire protection, schools, parks and recreation, and libraries) that would service the project.

DR SOCIO-4. Provide information on the capacity, service standards, levels of existing use and expected use, and any planned expansion of public facilities such as fire protection, law

enforcement, emergency response, medical facilities, school districts, parks and recreation facilities, libraries.

Appendix B (g) (7) (B) (i) requires an estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number of permanent operation workers during a year.

The application states that project construction would directly support 50 construction jobs and five operation workers. CEC staff needs the number of workers employed for each month during the construction.

DR SOCIO-5. Provide a table with the estimated number of workers required for each month by occupation for the construction period.

Appendix B (g) (7) (B) (v) requires the potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. The application does not include information on the public services that would service the project.

DR SOCIO-6. Discuss the potential impacts and response times for utilities, fire protection, law enforcement, emergency response and medical facilities, school districts, parks and recreation, libraries, and other public facilities.

Appendix B (g) (7) (B) (xiii) requires a discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations. The application does not include a discussion on environmental justice populations as it relates to socioeconomics.

DR SOCIO-7. Identify and discuss potential impacts to environmental justice populations and if there would be disproportionate effects on populations.

Appendix B (i) (1) (A) requires tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land

use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

DR SOCIO-8. Provide a table with any applicable laws, regulations, ordinances, standards (LORS), adopted local, regional, state, and federal land use plans, leases, and permits and a discussion of the conformance with each. Include references to pages and a conformance discussion on construction and operation.

Appendix B (i) (1) (B) requires tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority but for the exclusive authority of the Commission to certify sites and related facilities.

DR SOCIO-9. Provide the contact information for agencies that would have jurisdiction to issue applicable permits, leases, and approvals or to enforce identified LORS, and adopted local, regional, state and federal land use plans, if not for CEC's authority to certify sites.

Appendix B (i) (2) requires the name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for CEC staff. The application does not have a list of contacts for socioeconomics.

DR SOCIO-10. Provide a list of officials, and their contact information, who could serve as a contact person for staff.

Appendix B (i) (3) A schedule indicating when permits outside the authority of the CEC will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

DR SOCIO-11. If any permits related to socioeconomic needed for the project, please provide a schedule of the permits and applicants efforts in obtaining the permits.

DR SOCIO-12. The application includes the “Fiscal & Economic Impact Analysis for Proposed Battery Energy Storage System with Socioeconomic Impact Analysis”. This document was submitted with a “Draft” watermark on every page. CEC staff is requesting confirmation that this is the final document. If it is not, please submit the final document.

SOILS

See Geologic Hazards.

TRANSPORTATION

The CEQA Guidelines are not specific on whether to include or exclude construction traffic in the vehicle miles traveled (VMT) calculations, and the issue has not been specifically cited in any legal opinions. However, the California Air Resources Board released the Final Environmental Assessment on its Proposed Strategy for Achieving California’s 2030 Greenhouse Gas Target (Scoping Plan). In its programmatic analysis of impacts relating to transportation and traffic, it was concluded that construction activities would result in short-term construction traffic (primarily motorized) from worker commute and materials delivery trips. “Project specific impacts and mitigation would be identified during the environmental review by agencies with project-approval authority”. This suggests that analyzing construction-related impacts on transportation is of interest to the state. Given that construction of the project would generate a greater number of trips than operation, CEC staff concludes it is appropriate to examine the VMT during construction.

Section 15064.3, subdivision (a) of the CEQA Guidelines 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, the VMT analysis should evaluate worker, not truck, trips to/from the site during the construction phase.

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

DR TRANS-1. Please provide a calculation of average daily worker VMT over the full length of construction.

DR TRANS-2. Please provide a discussion of the assumptions and methods used for the construction worker VMT calculation, including assumptions for origin of employee trips.

TRANSMISSION SYSTEM DESIGN

For the identification of impacts on the transmission system and the indirect or downstream transmission impacts, CEC staff relies on the California Independent System Operator (California ISO) Interconnection Studies to ensure the interconnecting grid meets the California ISO reliability standards. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards.

Complete descriptions of the project transmission and interconnection facilities are also required to determine whether the project, as proposed, would comply with California Public Utilities Commission (CPUC) General Order (GO) 95, 128 and 131-E construction standards. Therefore, please provide the following information:

DR TSD-1. The applicant provided the LGIA only. Please provide the entire California ISO Interconnection Study Report including all the appendices and attachments. The study is needed to assess the impacts of the project on the California's grid.

DR TSD-2. Please provide the generator tie-line (gen-tie) cable type, size, and current carrying capacity. Please also specify the depth at which the cable would be constructed and specify conformance with requirements set by CPUC General Orders.

DR TSD-3. Please specify the width of gen-tie's Right of Way or easement through which the gen-tie would pass to connect to PG&E owned section.

DR TSD-4. Please provide the power ratings and nominal voltage for transformers and circuit breakers that would be installed at the BESS and project substation sites.

DR TSD-5. Please provide PG&E Green Valley Substation one-line diagram which shows the proposed project interconnection. Show all equipment ratings including bay arrangement of the breakers along with circuit breakers and transformers ratings.

DR TSD-6. Please specify the conformance with CPUC General Order 95, 128 and 131-E standards in reference to the project's underground and overhead electrical facilities such as the gen-tie and project substation including grounding, duct banks, derated ampacity, underground conductor clearances, and soil resistivity analysis.

WATER RESOURCES

Clean Water Act Compliance

As stated in Section 7 of the Aquatic Resources Delineation Report included as Attachment D of Appendix 3-2D (TN270254), approximately 4,248 linear feet of aquatic resources in the project area may be subject to Regional Water Quality Control Board (RWQCB) jurisdiction under CWA Section 401. If Waters of the State would be impacted, CCR Title 20, Appendix B (g) (14) (A) (i), requires that all information required to apply for a CWA Section 401 permit from the RWQCB should be included in the application. Typically, Opt-in program applicants include an application for such a permit to comply with this requirement. However, an application for dredge and fill waste discharge requirements (WDRs) does not seem to be included in the application submittal.

The Aquatic Resources Delineation Report also states that approximately 4,248 linear feet of aquatic resources in the project area may be subject to U.S. Army Corp of Engineers (USACE) jurisdiction under Clean Water Act (CWA) Section 404. Per CCR Title 20, Appendix B (g) (14) (A) (iii), all information required to apply for CWA Section 404 permits from the USACE needs to be included in the application.

According to the delineation report, an approved jurisdictional determination (AJD) was prepared and submitted to the USACE San Francisco District but does not seem to be included in the application submittal.

If USACE determines that the project would impact waters of the United States, the applicant must apply to the Central Coast Water Board for a Clean Water Act section 401 water quality certification. This information would include design of the optional secondary access road crossing of the water feature.

DR WATER-1. Please confirm whether a dredge and fill WDR application will be submitted. If applicable, please submit a dredge and fill WDR application to the Central Coast RWQCB, and to the CEC docket, for Waters of the State that may be impacted by the project, or submit information required to obtain Clean Water Act section 401 water quality certification.

DR WATER-2. Please submit to the project docket the Approved Jurisdictional Determination submitted to the USACE San Francisco District.

The applicant is correct that BESS facilities, because they are not power generating, do not fall under applicable SIC codes that require coverage under the State Water Resources Control Board's Order WQ 2014-0057-DWQ, as amended by Order WQ 2015-0122-DWQ and Order WQ 2018-0028-DWQ, *General Permit for Storm Water Discharges Associated with Industrial Activities* (IGP). However, the IGP contains the following provision: "XIX.F.: Consistent with 40 Code of Federal Regulations section 122.26(a)(9)(i)(D), the Regional Water Boards may require any discharge that is not regulated by this General Permit, that is determined to contribute to a violation of a water quality standard or is a significant contributor of pollutants to waters of the United States, to be covered under this General Permit as appropriate. Upon designation, the Discharger responsible for the discharge shall obtain coverage under this General Permit." This facility is a potential significant contributor, and the SWPPP should address runoff control measures for a potential fire event. The Central Coast RWQCB will likely require this discharge to obtain IGP coverage based on provision XIX.F.

DR WATER-3. Please modify the SWPPP to address control measures for a potential fire event and include a schedule to

participate in the General Industrial NPDES stormwater permit program.

WATER SUPPLY

Section 2.4.9, Construction Water Use of the application (TN270250) discusses operational water use. For clarity, this information should be included within Section 2.5 Operations and Maintenance.

DR WATER-4. Please include a subsection within Section 2.5 entitled "Operational Water Use" to describe water used during project operation.

The project description subsection 2.4.9 (TN270250), subsection 3.15.2.3 (TN270249), and the water supply assessment (Appendix 3.15D, TN270271), state that operational water supply would be provided by the City of Watsonville, Public Works and Utilities Water Division. CCR Title 20, Appendix B (g) (14) (C) (ii) requires "*The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents ...*". This information is included in the City of Watsonville Water Quality Report 2024, available online at <https://www.watsonville.gov/777/Water-Quality#docaccess-3032ff68a5f7fd8f2380a18fb955e1f8654285dd3eaed8de42cf8e68dbe44021>.

DR WATER-5. For public disclosure, please submit a PDF copy of the City of Watsonville Water Quality Report 2024 to the project docket.

Water Purveyor Information

As stated in Section 2.4.9 of the application (TN270250), operational water supply for landscape irrigation and charging the fire suppression system would be supplied by the City of Watsonville, connecting to their system at the intersection of Minto Road and Meidl Avenue. CCR Title 20, Appendix B (g) (14) (C) (vi) requires that for any water supply transfer, contracts and/or agreements between the parties should be identified.

DR WATER-6. Please describe the contract or agreement between the applicant and the City of Watsonville to supply water during project operation.

Stormwater Design

CCR Title 20, Appendix B (g) (14) (D) (iii) requires estimating changes in stormwater flow rates between pre- and post-construction conditions. The only reference to a comparison between pre- and post-construction stormwater flow rates was included in the summary of the Downstream Impact Report (Appendix 3.15A, TN270270): "*Due to the onsite increase of impervious area, the proposed stormwater mitigation features (bio-filtration areas) have been upsized to increase the detention volume to a 25-year storm event releasing at a 5-year pre-development rate.*"

DR WATER-7. Please include in Stormwater Management drawing C-4.1 (TN270252), a comparison of pre- and post-construction conditions for drainage management areas (DMAs) DMA "A," DMA "B," and DMA "C."

Based on the estimated post construction flow rates included in the Stormwater Management drawing C-4.1 (TN 270252), stormwater outflow through the 15-inch culvert pipe to the adjacent parcel during a 100-year storm event would be 32.41 cubic feet per second (CFS). Currently, there is no design element to protect the adjacent parcel from erosion during such an event.

DR WATER-8. Please include an energy dissipation feature in the project stormwater design, such as the rip-rap apron described in Construction Detail C-6.2, No. 5 (TN 270252), or explain why such a precaution is not necessary.

The Central Coast RWQCB has established post-construction stormwater requirements (PCRs) that apply to applicable projects that require approvals and/or permits issued under the permittee's planning, building, or other comparable authority. Review and implementation of PCRs take place through the permit review process. Since the project is within the MW4 boundary for Santa Cruz County, the project is subject to the Central Coast RWQCB's PCRs.

DR WATER-9. Please provide a stormwater control plan describing how the applicant intends to meet applicable stormwater control performance requirements and other PCRs. The required elements of the stormwater control plan are detailed in attachment 1 of R3-2013-0032

(https://www.waterboards.ca.gov/rwqcb3/water_issues/programs/s

tormwater/docs/lid/hydromod_lid_docs/2013_0032_attach1_post_construction_requirements.pdf).

CCR Title 20, Appendix B (i) (3), requires a schedule to obtain permits outside of CEC authority. Section 3.15.6 and Table 3.15-4 mention the National Pollutant Discharge Elimination System (NPDES) Construction General Permit and the dredge and fill waste discharge requirements (WDRs), both under the jurisdiction of the Central Coast RWQCB. However, a schedule to obtain these permits is missing.

DR WATER-10. Please include a schedule to participate in the General Construction NPDES Permit program and apply for dredge and fill WDRs with the Central Coast RWQCB.

WORKER SAFETY AND FIRE PROTECTION

California Code of Regulations, title 20, Appendix B (g) (1) requires a discussion of the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. The application includes Table 3.17-5, Project Remote Monitoring Framework, Section 3.17.2.4.1, Pajaro Valley Fire Protection District Requirements, and Section 3.16.1.9 Emergency Response and Fire Protection. However, the application lacks significant details on the proposed measures to mitigate potentially adverse impacts during an emergency response. For example, the application describes the project as remotely monitored, as well as supported by weekly maintenance visits by up to eight workers. The proposed BESS enclosures exceed the maximum allowable quantities of electrochemical ESS per the California Fire Code. These conditions have the potential to contribute to adverse impacts during an emergency response.

DR WS-1. Provide a discussion of the anticipated time for operations personnel to arrive onsite following an emergency or notification by the monitoring system.

DR WS-2. Provide a discussion of proposed measures that the project would implement to mitigate impacts to the local first response agencies (fire department) due to an incident involving a BESS enclosure (e.g., project features, funding agreement, training, reimbursement, etc.).

DR WS-3. Provide a schematic and complete description of the Fire Command Center (also called First Responder Station) referenced in the draft Emergency Response Plan, Appendix 3.16C.

DR WS-4. Provide a complete description of the proposed measures for supplying additional fire water supply during extended emergency conditions.

DR WS-5. Provide a history of failure incidents involving at least one enclosure or multiple enclosures of the representative BESS enclosure, CATL model EnerC+ 306 (provided under confidential cover if trade secrets and commercially sensitive information are included). Provide a complete description of the proposed measures to prevent failure incidents for the proposed project.

DR WS-6. Provide the most current emergency response recommendations from the BESS enclosure manufacturer.

DR WS-7. Provide a discussion of the fire response capabilities, EMS capabilities, and hazardous materials team for the local first response agencies for incidents involving a BESS enclosure.

California Code of Regulations, title 20, Appendix B (g) (11) (B) requires a complete description of the fuel handling system and the fire suppression system. The application lacks significant details on the proposed fire prevention, extinguishing, and suppression systems (fire protection) and fire detection and alarm systems. For example, Section 3.17.2.4, Fire Protection, does not address fire protection systems for all project buildings and structures.

CEC staff requires additional details for the project's proposed fire protection, and detection and alarm systems to verify that the project has proposed adequate project features to mitigate adverse impacts to operations personnel, emergency first responders, and the public. CEC staff requires complete descriptions of project features. A complete description includes a schematic and a diagram of a typical BESS container/enclosure. 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 WS-8. Provide a schematic, equivalent to at least 30 percent design plans, and a complete description of the proposed fire protection systems for the project site, such as the fire water loop, fire water storage tanks, fire pumps, fire hydrants, etc.

DR WS-9. Provide a schematic, equivalent to at least 30 percent design plans, and complete description of the proposed fire protections systems for all project buildings and structures, including the O&M building (an existing residential structure), SCADA control building, etc.

DR WS-10. Provide a schematic, equivalent to at least 30 percent design plans, and a complete description of the proposed fire detection and alarm systems for the project site.

California Code of Regulations, title 20, section 1704 (a) (3) (A), requires descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. California Code of Regulations, title 20, section 1704 (a) (3) (B), also requires the description to include the methodologies and findings of all major studies or research efforts undertaken and relied upon to provide information for the document. Section 2.3.1.11, Fire Protection System, and Section 3.17.2.4, Fire Protection, describe two on-site fire hydrants for the project, as requested by the Pajaro Valley Fire Protection District and supplied by the existing city of Watsonville water distribution system. However, Appendix 3.15D, Water Supply Assessment, and Appendix 3.16B, Hazard Mitigation Analysis, provide an incomplete fire water supply analysis. In addition, Appendix 3.16A, UL 9540A Test Results (confidential), includes a UL 9540 certificate and UL 1973 report rather than the UL 9540A test reports.

CEC staff requires up-to-date information on the research efforts the applicant has completed or plans to complete related to the project's fire protection systems in accordance with the most current laws, ordinances, regulations, and standards such as the 2025 California Fire Code and California Public Utilities Code Section 25545.19.

DR WS-11. Provide a fire water supply analysis to confirm adequate water supply for the project site, including results of flow tests from the water source such as the existing city of Watsonville water distribution system. Provide the project's worst-case fire flow requirements in gallons per minute, with minimum pressure and duration requirements for each of the project's exposure hazards

(e.g., transformer fire, BESS fire). Provide descriptions of all significant assumptions, methodologies, and computational methods used in arriving at those conclusions, including correspondence with the local fire department detailing the local requirements.

DR WS-12. Provide the UL 9540A cell, module, and unit level test reports in accordance with the 2026 edition of UL 9540A and the 2025 California Fire Code Section 1207.1.7 for the representative BESS enclosure, CATL model EnerC+ 306 (provided under confidential cover if trade secrets and commercially sensitive information are included).

DR WS-13. Provide an updated Hazard Mitigation Analysis for the representative BESS enclosure, CATL model EnerC+ 306 in accordance with the California Fire Code, 2025 Edition, section 1207.1.6 and the local fire department requirements.

DR WS-14. Provide documentation of the consultation with the local fire department(s) in accordance with California Public Resources Code Section 25545.19. The Application Section 3.16 mentions a most recent virtual meeting held on February 19, 2026.

California Code of Regulations, title 20, Appendix B (g) (11) (B) requires a complete description of the fuel handling system and the fire suppression system. The Application lacks significant details on emergency backup power sources, such as diesel generators. Furthermore, Appendix 3.16B, Hazard Mitigation Analysis, is missing information on backup power for the NFPA 69 explosion control system.

DR WS-15. 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.