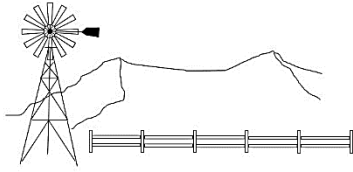


DOCKETED	
Docket Number:	25-OPT-02
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TN #:	272167
Document Title:	Save Our Rural Town Comments - Supplemental comment opposing schedule modification request
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Submitted On: 8/25/2026
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Supplemental comment opposing schedule modification request

Additional submitted attachment is included below.



SAVE OUR RURAL TOWN

Lisa Worrall, Project Manager
California Energy Commission
715 P Street, MS-40
Sacramento, CA 95814

August 25, 2026

Subject: Save Our Rural Town Supplemental Comments on Applicant's Request for a Schedule Modification.

Reference: Applicant Submittal Dated August 19, 2026.
Docket Number 25-OPT-02.

Dear Ms. Worrall;

Save Our Rural Town (SORT) offers the following comments to supplement our opposition to the Applicant's request for a schedule modification filed August 19, 2026.

AB 205 establishes clear deadlines for completing milestones under the California Energy Commission's (Commission's) Opt-In program to give the public and the applicant certainty regarding the extent and schedule for processing applications, and it is not in the public interest to "drag out" proceedings without good cause. California Public Resources Code Section 25545.4(e)(2)(F) clearly establishes that the schedule established for Opt-In projects shall not be altered unless there is a demonstrated "reasonable need" for the schedule change. The Commission has already delayed the schedule in the referenced Docket by 60 days because the applicant claimed that more time was needed to "complete and incorporate certain technical analyses relevant to the preparation of the Draft Environmental Impact Report"; those 60 days have come and gone, and the applicant has never submitted any new "technical analyses" in the docket. Clearly, there was **never** any "reasonable need" for the first schedule extension, and the Commission *should not have granted it*.

Now, the applicant wants another 60 day extension to address claimed "scope of work" changes by Southern California Edison which are not identified or described, but which the applicant nonetheless alleges will affect the alignment of proposed gen-tie facilities. However, the applicant's allegation that SCE "Scope of Work" revisions affect proposed gen-tie facilities is controverted by the record; thus, it cannot be accepted by the Commission as evidence that there is a "reasonable need" for the extension request.

As explained in our letter dated August 19, 2026, SCE's "Scope of Work" affecting the proposed gen-tie interconnect is restricted to the terms and conditions set forth in the Large Generator Interconnection Agreement (TN# 265695) about which the applicant already has full knowledge and to which the applicant has already agreed. Because SCE's entire "scope of work" relating to the applicant's gen-tie interconnect are constrained by the LGIA, any changes to SCE's "scope of work" are also constrained by the LGIA and thus already fully understood and accounted for by the applicant. In other words, there can be no revisions in SCE's "Scope of Work" that would substantively alter the gen tie interconnect in a manner that the applicant could not have anticipated because such revisions would require amendments to the executed LGIA and, by extension, would compel the applicant to disclose them to the Commission (because the LGIA is an essential part of the record and thus modifications to it are relevant and must be disclosed).

Because the applicant has neither informed the Commission that the LGIA has been revised nor entered a copy of a revised LGIA into the docket, the Commission has no basis upon which to find that SCE "scope of work" changes have affected proposed gen-tie facilities in a manner which the applicant could not have anticipated. And, because the applicant has failed to describe these alleged SCE "Scope of Work" changes or explain how they affect proposed gen-tie facilities, the Commission has no factual basis upon which to conclude that there is a "reasonable need" for the requested schedule modification. Accordingly, the Commission is barred by California Public Resources Code Section 25545.4(e)(2)(F) from granting the requested schedule modification.

The Commission has already been hoodwinked into granting one 60 day extension based on false assurances that the applicant needed the time to prepare additional studies *that have never been submitted into the docket*; now, the applicant is trying to hoodwink the Commission a second time by claiming (without explanation) that SCE "Scope of Work" changes necessitate an extension. This claim is groundless: SCE's "Scope of Work" is fully circumscribed by the LGIA and has been fully understood by the applicant since before the Commission opened the referenced Docket. The applicant has failed to demonstrate there is a "reasonable need" for the extension, and the Commission cannot pretend that there is. Therefore, SORT respectfully requests that the Commission deny the requested schedule modification.

Respectfully submitted;

/S/Jacqueline Ayer

Jacqueline Ayer, Director
Save Our Rural Town