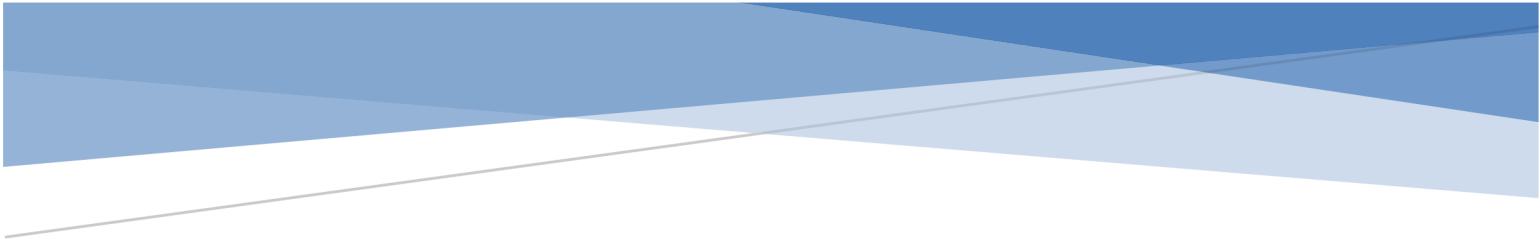


DOCKETED

Docket Number:	25-SPPE-02
Project Title:	NorthTown Backup Generating Facility (NTBGF)
TN #:	272259
Document Title:	GIC San Jose Responses to CEC Data Request Set 3 - NTBGF
Description:	N/A
Filer:	Scott Galati
Organization:	DayZenLLC
Submitter Role:	Applicant Representative
Submission Date:	8/31/2026 10:48:02 AM
Docketed Date:	8/31/2026



RESPONSE TO CEC STAFF DATA REQUEST SET 3

NorthTown Backup Generating Facility (25-SPPE-02)

SUBMITTED TO: CALIFORNIA ENERGY COMMISSION

SUBMITTED BY: GIC San Jose LLC

August 2026



INTRODUCTION

Attached are GIC San Jose LLC (GIC San Jose) responses to California Energy Commission (CEC) Staff Data Request Set No. 3 for the NorthTown Backup Generating Facility (NTGBF) Application for Small Power Plant Exemption (SPPE) (25-SPPE-02).

The Data Responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as Staff presented them and are keyed to the Data Request Numbers. Additional tables, figures, or documents submitted in response to a data request (e.g., supporting data, stand-alone documents such as plans, folding graphics, etc.) are found in Attachments at the end of the document and labeled with the Data Request Number for ease of reference.

For context, the text of the Background and Data Request precede each Data Response.

CULTURAL AND TRIBAL CULTURAL RESOURCES

BACKGROUND: Results of Literature Search

Several data requests were made in Data Request Set 1 (TN 265198) related to the results of the cultural resource literature search discussed in the applicant's Confidential Cultural Resources Technical Report (CRTR, Chronical Heritage 2025a). DR CUL/TRI-1 requested the applicant provide copies of site records for resource P-43-003283. DR CUL/TRI-2 requested that the applicant provide a copy of a map of past cultural resources surveys of the literature search area. DR CUL/TRI-3 requested that the applicant provide a map of all previously known cultural and tribal cultural resources compiled through their research. Finally, DR CUL/TRI-4 requested copies of all technical reports whose survey coverage is wholly or partly within 0.25 miles of the area surveyed for the proposed project, or which report on any archaeological excavations or architectural surveys within the literature search area.

The applicant indicated in their Responses to Data Requests Set 1 (TN 267634) that the information related to DR CUL/TRI-1 and DR CUL/TRI-4 would be provided to the CEC once the applicant received from the Northwest Information Center (NWIC), and information related to DR CUL/TRI-2 and DR CUL/TRI-3 would be included in a Revised CRTR, docketed under a repeated request for confidentiality. On March 13, 2026, CEC staff received a Revised CRTR (Chronical Heritage 2025b) from the applicant and on April 22, 2026, received the attachments to the revised CRTR. The CEC staff has reviewed the Revised CRTR and attachments and has follow-up requests pertaining to the results of the literature search.

The CEC's information requirements related to the results of literature searches conducted to identify cultural and tribal cultural resources are detailed in California Code of Regulations, Title 20, Division 2, Chapter 5, Appendix B (g)(2)(B). SPPE applications shall include copies of California Department of Parks and Recreation (DPR) 523 series forms for all cultural and tribal cultural resources identified in the literature search. The letter report from the NWIC included in Attachment A of the revised CRTR provides the results of the applicant's requested records search "with the requested resources and reports removed." (Richards 2025).

The Revised CRTR states that the results of the records search indicated that no previously identified cultural resources had been identified within the project area (Chronical Heritage 2025b, page i). However, the Records Search Results Map provided in Attachment A depicts resource P-43-000318 within the project area. Site records for this resource were not included in the revised cultural resources technical report and the resource was not identified, described, or considered in the Revised CRTR.

The Records Search Results Map prepared in response to DR CUL/TRI-3 is in Attachment A of the Revised CRTR but does not include Resource P-43-000317.

Resource P-43-000649 is depicted on the Records Search Results Map. Based on the records for this archaeological site, a portion of it occupies the eastern bank of the Guadalupe River adjacent to the project site and might extend into the project area (Kaijankoski 2012, pages 1–2; Voss et al. 1993, p. 1). Despite the nearness of P-43-000649 to the project site, the resource is not discussed in the Revised CRTR.

Attachment A of the Revised CRTR contains copies of all previous technical reports identified by the NWIC as wholly or partly within the project area. However, copies of excavation reports identified within the literature search area are not included in Attachment A of the Revised CRTR.

DATA REQUESTS

REV 3 CUL/TRI-1 Please provide a copy of the records search request to the NWIC so that it is evident to the CEC staff which resources and reports were identified and then removed when the NWIC reported its results to the applicant.

RESPONSE TO DATA REQUEST REV 3 CUL/TRI-1

Chronical Heritage has revised the CRTR and a copy of the records search request is included in Attachment A to the CRTR. The CRTR has been docketed pursuant to a request for continued confidentiality. Due to the nature of the records included in Attachment A they cannot be docketed but were sent to the CEC Staff electronically.

REV 3 CUL/TRI-2 Please provide the site records for resource **P-43-000318** and revise the CRTR to describe, evaluate, and consider the project's potential impacts to the resource and propose measures to avoid or minimize potential adverse effects to the resource, as applicable.

RESPONSE TO DATA REQUEST REV 3 CUL/TRI-2

Chronical Heritage has revised the CRTR to include records to Attachment A of the CRTR and has revised portions of the CRTR to provide a description evaluation and measures to protect resource **P-43-000318**.

REV 3 CUL/TRI-3 Provide a revised Records Search Results Map that includes resource **P-43-000317**.

RESPONSE TO DATA REQUEST REV 3 CUL/TRI-3

See Attachment A to the CRTR.

REV 3 CUL/TRI-4 Please revise the CRTR to describe, evaluate, and consider the project's potential impacts to resource **P-43-000649**. Propose measures to avoid or minimize potential adverse effects to the resource, as applicable.

RESPONSE TO DATA REQUEST REV 3 CUL/TRI-4

Chronical Heritage has revised the CRTR has revised portions of the CRTR to provide a description evaluation and measures to protect resource **P-43-000649**.

REV 3 CUL/TRI-5 Provide copies of the following excavation reports on file at the NWIC identified within the literature search area:

- **S-004651 (Bard et al. 1979)**
- **S-004819 (Kobori et al. 1979)**
- **S-004835 (Kobori and Bard 1980)**
- **S-004959 (Bard at al. 1981)**
- **S-006310 (Cartier 1983)**
- **S-006387 (Busby et al. 1981)**
- **S-006409 (Busby et al. 1983)**
- **S-007552 (Bard et al. 1985)**
- **S-008227 (Bard et al. 1986)**
- **S-038292 (Koenig 2011)**
- **S-015131 (Cartier et al. 1993)**
- **S-019387 (Cartier et al. 1996)**

RESPONSE TO DATA REQUEST REV 3 CUL/TRI-5

See Attachment A to the CRTR