

DOCKETED

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September 25, 2026

GIC Vernon, LLC
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 2 for Vernon Backup Generating Facility (25-SPPE-01)

Dear Mr. Galati:

Pursuant to Title 14, California Code of Regulations, section 15084(b) and Title 20, California Code of Regulations, section 1941, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 2, which is necessary for the staff analysis of the Vernon Backup Generating Facility (VBGF), under the California Environmental Quality Act (CEQA).

These data requests seek further information in the area of Alternatives based on the contents of the application submitted thus far. CEC staff may submit subsequent data requests in this and other resource areas based on further information received or as necessary for a complete analysis of the proposed project.

To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA pursuant to Title 14, California Code of Regulations, sections 15108 and 15109; staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please send written notice to me within 10 days of receipt of this letter.

If you have any questions, please email me at Elizabeth.Huber@energy.ca.gov.

Elizabeth Huber
Project Manager

Enclosure: Data Requests Set 2

VERNON BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 2

ALTERNATIVES

Author: Jennifer Wu

BACKGROUND: Range of Reasonable Alternatives

Section 5.0, Alternatives, of the SPPE application (TN 262029) provides a description of the proposed project alternatives the applicant considered for possible backup generation during a grid emergency. The alternatives consist of reduced capacity system and backup electric generation technologies (gas-fired turbines, flywheels, gas-fired reciprocating internal combustion engines, batteries, fuel cells [backup replacement and primary generation/grid backup], and alternative fuels).

DATA REQUESTS

DR ALT-1. Section 5.1, Evaluation Criteria, states that a description of a no project alternative is included, but no description appears in the section. Please include a description of the no project alternative and address the extent that the no project alternative would feasibility attain the basic objectives of the project and whether it would avoid or substantially lessen any of the significant effects of the project.

DR ALT-2. In accordance with Public Resources Code section 25540.6(b), please provide the applicant's site selection criteria, any alternative sites that the applicant considered for the project, and the reasons why the applicant chose the proposed site.

BACKGROUND: SCAQMD NOP Comment Letter Alternatives Considerations

The South Coast Air Quality Management District (SCAQMD) submitted a Notice of Preparation (NOP) comment letter dated September 3, 2026, in response to the NOP of a Draft Environmental Impact Report for the Vernon Backup Generating Facility (dated August 5, 2026). SCAQMD's NOP comment letter states that "the Vernon Public Utility has its own backup power supply" and that "concerns about adequate natural gas service, pressure, capacity, and reliability" should be supported by information from the natural gas provider (SCAQMD, letter dated September 3, 2026).

The SPPE application (TN 262029) states that natural gas-fueled equipment for backup power generation was considered and rejected as an alternative to diesel, due to concerns that: 1) gas infrastructure is more likely to experience fuel curtailments during natural disasters and other emergency loss of utility power than liquid fuel sources; and 2) onsite storage or delivery of natural gas to address the curtailment issues during an emergency is impossible to support long duration of backup (24 hours or longer time) due to the volume required.

The SCAQMD letter states that existing natural gas transmission and distribution infrastructure generally provides a highly reliable fuel supply. Moreover, natural gas engines can provide backup power with fewer air quality and GHG impacts when

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compared to diesel-fired backup engines. According to the SCAQMD comment letter, a natural gas engine equipped with appropriate emission controls that is capable of achieving a NO_x emission rate of 0.03 grams per kilowatt-hour (g/kW-hr) would emit approximately 96 percent fewer NO_x emissions than a Tier 4 Final diesel engine emitting NO_x at a rate of 0.7 g/kW-hr.

DR Alt-3. Please provide analysis or evidence that use of natural gas-fueled equipment would be infeasible as an alternative to diesel-fired engines. Further, any concerns about adequate natural gas service, pressure, capacity, and reliability during a power outage should be addressed with input from the natural gas provider(s) (Southern California Gas Company and/or Vernon Public Utilities) serving the project area.

The feasibility of natural gas service should consider design measures such as backup or redundant natural-gas supply line(s), backup fuel, or other measures to ensure a reliable fuel supply during a power outage. The consideration of natural gas feasibility should address reliability, duration, and emissions compared with the proposed use of diesel generators.

DR Alt-4. Based on the analysis above, should natural gas be a viable alternative, please provide information on the design of the natural gas-fired backup generation facility, including capacity, scale, type of equipment needed, footprint, fuel usage, maintenance characteristics/testing, and other facility needs.

DR Alt-5. Has the applicant contacted Vernon Public Utilities on whether any of the City of Vernon power facilities could be available to serve any portion of dedicated energy backup resources for the project? Please provide documentation or explanation regarding the feasibility of Vernon Public Utilities providing any portion of the project's backup power supply.

REFERENCES

DayZen LLC 2025. Prepared for GIC Vernon, LLC. Application for Small Power Plant Exemption, GIS Vernon SPPE Application Vernon Backup Generating Station – Main Application. February 2025. TN 262029.

South Coast Air Quality Management District (SCAQMD). 2026. SCAQMD Comment Letter on NOP of a Draft EIR for the Vernon Backup Generating Facility. September 3. TN 272324.