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Vaca Dixon Power Center Project (CEC Docket No. 26-OPT-01)

CEC Data Request Response Set #2

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1 Introduction

1.1 Introduction

On February 13, 2026, Vaca Dixon BESS LLC/Arges BESS LLC (Applicant) received a Determination of Incomplete Application and Request for Information from the California Energy Commission (CEC) for the Vaca Dixon Power Center Project (Project) (26-OPT-01) in response to the Applicant's application filed on January 14, 2026. The following document provides the Applicant's second set of responses to the Data Requests received from the CEC. Table 1 lists all Data Requests for which a response is provided in Response Set #2.

Table 1 Data Responses Included in Response Set #2

Data Request Resources Area	Data Request Number
Hazardous Materials	HAZ-9
Land Use	LU-1 through LU-4
Public Health	PH-1 through PH-6
Water Resources	WATER-1 through WATER-3
Worker Safety	WS-1 through WS-22

The responses are grouped by individual discipline or topic area and are presented in the same order and with the same numbering provided by the CEC. The responses included in this document are considered complete responses to the corresponding Data Requests.

Data request responses related to Public Health and Worker Safety reference the Vaca Dixon BESS Hazard Mitigation Analysis (Coffman Engineers 2026) (Updated Vaca Dixon HMA), the Arges BESS Hazard Mitigation Analysis (Coffman Engineers 2026) (Updated Arges HMA), Vaca Dixon Power Center Project Emergency Response Plan (Coffman Engineers 2026) (Updated ERP), and Fire Alarm Site Aggregation Drawings. These documents are anticipated to be submitted to the Project docket the week of October 26, 2026.

2 Hazardous Materials Handling

2.1 Data Requests DR HAZ-9

2.1.1 Data Request DR HAZ-9

DR HAZ-9: Provide a discussion on whether a lithium battery fire at the project BESS site would result in the closure of nearby I-80, and other nearby access roads. Would the fire at the BESS have smoke visibility, or inhalation risks that could result in the closure of I-80 and surrounding local access roads? What actions could be implemented to reduce this risk of potential impacts to motorists?

Response: As discussed in the *AERMOD Hazard Consequence Analysis for CEC Data Request, Attachment B; Requests DR PH-2 through DR PH-6* (Rincon 2026) (Updated HCA), a flaming scenario at the Project BESS site could result in, Level 1 Acute Exposure Guideline Level (AEGL) and Emergency Response Planning Guidelines (ERPGs) values reaching Interstate-80 (I-80). Public exposure guidelines published by the United States Environmental Protection Agency predict that exposure to this level of hazard could lead to notable discomfort, irritation or certain asymptomatic non-sensory effects. However, the effects are not disabling and are transient and reversible upon cessation of exposure. Smoke visibility from I-80 resulting from a flaming scenario would also be possible.

To support emergency planning, an exceedance of an AEGL or ERPG Level 1 would result in a community notification, as identified in the United States Army Public Health Center's 2011 *Frequently Asked Questions Regarding Acute Exposure Guideline Levels (AEGLs) and their Applications.* Based on the expected hazard level, a closure of I-80 would not be anticipated to be warranted.

3 Land Use

3.1 Data Requests DR LAND-1 through DR LAND-5

3.1.1 Data Request DR LAND-1

DR LAND-1: Per California Code of Regulations, Title 20, Appendix B (g)(3)(A)(ii), Appendix B (g)(3)(B), and Appendix B (i)(1)(A), update the discussion in application Section 5.2.3, Impact LU-2, to discuss the project's conformity with the City of Vacaville's proposed BESS ordinance issued in November 2025. Please describe the project's consistency with proposed development standards from the draft BESS ordinance within the existing Business Park zoning district.

Response: Section 5.2 Land Use has been revised to include a discussion of the City of Vacaville's proposed BESS ordinance under Impact LU-2.

3.1.2 Data Request DR LAND-2

DR LAND-2: Per California Code of Regulations, Title 20, Appendix B (g)(3)(C), please provide the following:

- Provide documentation of site control for each legal parcel on which project components are proposed (i.e., APN 0133-060- 060 and APN 0133-060-070). Documentation can include a copy of each lease agreement and/or a table identifying the terms and conditions of the lease agreement for each parcel. At a minimum, include:
  - The type of site control instrument for each parcel (e.g., lease, option to lease, easement, license, purchase agreement);
  - The parties to each agreement;
  - The effective date, term length, expiration date, and any renewal/extension provisions;
  - Identification of which project components and activities are covered (construction, operation, maintenance, and decommissioning), and any relevant limitations or conditions; and
  - The portion of the parcel covered by the agreement (e.g., acreage, exhibit map, legal description).

Response: Documentation of site control for each of the legal parcels on which Project components are proposed (i.e., APN 0133-060- 060 and APN 0133-060-070) are included in Confidential Appendix DR LAND-1. Site control of APN 0133-060-060 was executed through a Lease Option Agreement between the Applicant Thiara Brothers, LLC and Hilbers M&M L.P., covering construction of the Vaca Dixon and Arges BESS facilities. Construction and operation of the gen-tie line on APN 0133-060-070 was executed through a Ground Lease between the Applicant and Pacific Gas & Electric Company.

3.1.3 Data Request DR LAND-3

DR LAND-3: To support staff's LESA model analysis, please provide the following:

- Provide the official citation (i.e., source information) for application Figure 5.2-4 (Agricultural Uses Within One Mile of the Project Site). While the figure identifies the agricultural use data source as "CRNA 2025," the information for this source is not included in application Section 5.2.8 (References).
- Identify all protected easements (i.e., agricultural, wildlife habitat, open space, or other natural resource easements) within one mile of the project site and provide a figure identifying the location of these easements. If the existing Williamson Act Contracts illustrated in Figure 5.2-6 are the only protected easements within one mile of the project, please confirm.

Response: The citation for Figure 5.2-4 is: California Natural Resources Agency (CNRA). 2024. Statewide Crop Mapping—California Natural Resources Agency Open Data. https://data.cnra.ca.gov/dataset/statewide-crop-mapping (accessed February 2026).

Based on review of the California Protected Areas Database, the California Conservation Easement Database, CDFW Conservation Plan Boundaries Database, City of Vacaville General Plan, Solano County General Plan and the Solano County Trust Database, there are no protected easements within one mile of the Project site except for the active Williamson Act contracts shown in Figure 5.2-6.

3.1.4 Data Request DR LAND-4

DR LAND-4: Staff requires documentation demonstrating that Solano Land Trust would assist the Applicant with execution of the proposed Agricultural Mitigation Strategy to verify the feasibility of this mitigation. Please provide relevant documentation such as a letter of commitment from Solano Land Trust that confirms Solano Land Trust will assist the Applicant with the execution of a mitigation agreement.

Response: The Applicant is currently in coordination with the CEC regarding the Agricultural Mitigation Strategy and the feasibility of mitigation. The Applicant has provided coordination with Solano Land Trust to date to the CEC.

4 Public Health

4.1 Data Requests DR PH-1 through DR PH-6

4.1.1 Data Request DR PH-1

DR PH-1: Please clarify which number is the correct one or explain the differences between these two.

Response: The Residences Risk in Table 5.8-1 (CEC Docket TN #268155) contained an error and will be revised to reflect the correct value in the HRA (1.75 per million).

4.1.2 Data Request DR PH-2

DR PH-2: Please provide a dispersion modeling analysis of all potential criteria air pollutants and TACs for the thermal runaway/fire scenario using a well-validated model (AERMOD and HARP2 preferred), including the TACs in Attachment F: Cell Gas Analysis Report (CEC Docket TN #268173-3) and those mentioned above using available representative data from the literature review or measured from any BESS test.

Response: A dispersion modeling analysis is included in the Updated HCA.

4.1.3 Data Request DR PH-3

DR PH-3: If the modeling data originate from literature review, please provide a copy of the referenced literature. If the modeling data come from a BESS test, please also provide the specific analytical method(s) for determining the presence of off-gassing constituents in the test, including sample collection methods, laboratory preparation methods, analytical methods, the MDL (method detection limit) or PQL (practical quantitation limit) or RL (reporting limit) for all measured constituents, and all QA/QC (quality assurance/quality control) data including results of a spiked sample.

Response: The following documents were primarily used in the preparation of the HCA and are included as Attachments B through E of this document. Additional literature was reviewed. Please refer to the HCA provided as Attachment A to this document for more information.

- McAllister, Jamie L. et al. SFPE Foundation. June 2025. Environmental and Health Impacts of Thermal Runaway Events in Outdoor Lithium-Ion Battery Energy Storage System Installations
- A. Iqbal et al., July 2025. Comparative fire hazards of lithium-ion battery chemistries: Linking thermal behavior, gas toxicity, and state-of-charge to composite risk profiles. Journal of Power Sources 655 (2025) 237914
- Ramboll, March 2024, Offsite Consequence Analysis, Vistra Morro Bay Battery Energy Storage System (BESS) Project
- UL 9540A. 2023. Cell Test Report

4.1.4 Data Request DR PH-4

DR PH-4: Please identify the assumed worst-case scenario, including but not limited to the number of cells or modules involved, state of charge, burn duration, and emission factors. Please provide justification demonstrating that the assumptions are both representative and conservative to be protective of public health.

Response: The assumed “worst case scenario”, described as the flaming scenario in the Updated HCA, would be a thermal runaway event involving an entire BESS enclosure. The flaming scenario would assume that all cells in the BESS enclosure would undergo thermal runaway and propagate beyond a non-

flaming scenario. The Project originally analyzed a “credible event” with a total of four cells undergoing thermal runaway per the unit test for the Arges BESS and a total of three cells undergoing thermal runaway per unit test for the Vaca Dixon BESS based on UL 9540A module and unit tests; however, under direction from the CEC, the more conservative flaming scenario is now incorporated in the analysis. UL 9540A testing has demonstrated that the failure and thermal runaway of one module is unlikely to propagate beyond the “credible event”. Based on results of the large-scale fire tests, it would also not be expected to propagate beyond a single enclosure. Emissions factors are detailed in the Updated Hazard Consequence Analysis.

4.1.5 Data Request DR PH-5

DR PH-5: Please compare the modeled TACs concentrations to appropriate health-based exposure thresholds, including the U.S. EPA Acute Exposure Guideline Levels (AEGL), the OEHHA/CARB acute Reference Exposure Levels (RELs), and Emergency Response Planning Guidelines (ERPGs) thresholds but excluding the Immediately Dangerous to Life or Health (IDLH) levels since they are not health protective, and demonstrate whether the acute hazard Index (HI) of TACs would be higher than the significance threshold of 1.0 at sensitive receptors. Please demonstrate whether the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards.

Response: A comparison of the modeled TACs concentrations to appropriate health-based thresholds is included in the Updated HCA.

4.1.6 Data Request DR PH-6

DR PH-6: If the acute HI would exceed 1.0 or the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards, please explain what mitigation measures are planned to be implemented to reduce the impacts to less than significant.

Response: As analyzed in the Updated HCA, the Hazard Index would not exceed 1.0 at sensitive receptors in any of the modeled scenarios.

5 Water Resources

5.1 Data Requests DR WATER-1 through DR WATER-3

5.1.1 Data Request DR WATER-1

DR WATER-1: Please provide the additional data requirements related to the 401 Water Quality Certification and 404 Permit:

- Section 401 Water Quality Certification application (draft application is sufficient at this time).
- An aquatic resource delineation report verified by U.S. Army Corps of Engineers, if verification is required by the Corps.
- A description of the waters proposed to be impacted by the project including the quantity of impacts to waters proposed to receive a discharge of dredged or fill material at each location rounded to at least the nearest one-hundredth (0.01) of an acre and nearest linear foot, and cubic yards of fill.
- A compensatory mitigation plan for permanent physical loss and permanent ecological degradation of a water of the U.S. The plan shall comport with State Water Resources Control Board's Supplemental Dredge or Fill Guidelines, Subpart J. A link is provided: State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (ca.gov) (https://www.waterboards.ca.gov/water_issues/programs/cwa4 01/docs/2021/procedures.pdf).

Response: The Project Aquatic Resources Delineation Report, included within the Comprehensive Biological Survey Report, identified fourteen jurisdictional resources within the Biological Study Area (BSA), which included the Project area as well as a 250-foot buffer. The Project is being designed to avoid all impacts to the jurisdictional features identified within the BSA during construction and operation; therefore, a 401 Water Quality Certification and Section 404 permit would not be required.

5.1.2 Data Request DR WATER-2

DR WATER-2: Please provide the current status of the coordination with the City and how likely the City would approve the proposed project's request and whether the City would be issuing a will-serve letter for the project.

Response: At the time of this response, the Applicant is no longer pursuing a request to utilize the City of Vacaville water main to meet water supply requirements. The Project would self-serve water required for fire water and landscaping and would utilize an on-site groundwater well and water storage tank as the primary source of water. A Groundwater Feasibility Study was prepared and submitted to the Project docket on August 11, 2026 (CEC Docket TN #271961).

5.1.3 Data Request DR WATER-3

DR WATER-3: Please provide a permitting schedule and discussion of steps taken and/or plans for obtaining required permits outside the authority of the Commission. This should also include the required contact details and designated staff contact for the agencies listed in Section 5.13.6, as these are currently missing.

Response: Table 5.13-19 in Section 5.13.6 identifies two agencies the project Applicant will coordinate with to secure water-related permits or approvals, including the Central Valley Regional Water Quality Control Board (RWQCB), for stormwater discharges and the Solano Irrigation District GSA, for activities within the Solano Subbasin that could affect groundwater.

As discussed under Impact HWQ-1, the Project is required to comply with the Construction General Permit (CGP) through implementation of a Project-specific stormwater pollution prevention plan (SWPPP), in accordance with Section 402 of the federal Clean Water Act which defines the National Pollutant Discharge Elimination System (NPDES) program; the NPDES program is administered by the State Water Resources Control Board (SWRCB), through the nine RWQCBs, and application packages are submitted to the SWRCB through the Stormwater Multiple Application and Report Tracking System (SMARTS).

- At least 14 days prior to any soil disturbance for Project construction, the Project Applicant will submit a CGP application package in the form of a Notice of Intent (NOI), Project-specific SWPPP, and required fee via SMARTS.
- Coverage under the CGP is granted once SMARTS accepts the application package and fee; however, construction may begin only after the Project receives a Waste Discharge Identification (WDID) number from the SWRCB, which is a unique tracking number assigned to Projects covered by the CGP for NPDES compliance. The WDID number and a Notice of Applicability (NOA) confirming CGP coverage will be issued through SMARTS.
- Table 5.13-19 does not identify an agency contact name and phone number for this coordination because all Project application materials and approval confirmation are provided through the online SMARTS.

If construction of the Project will require dewatering activities to remove shallow groundwater from active work areas, the Project Applicant may also seek coverage under the Central Valley RWQCB's Low-Threat Waiver for the discharge of water removed through dewatering, where the discharge would occur to land and would not reach surface waters or storm drains. The Project Applicant will determine if dewatering may be required during final engineering and design.

- At least two to three weeks before any discharge of water removed during dewatering, the Project Applicant will submit a Low-Threat Waiver application package to the Central Valley RWQCB, which routes application packages to staff in the "NPDES / Non-15 Permitting Unit" for the relevant geographic area, with staff assignments rotating over time.
- Coverage is granted and dewatering may begin once the RWQCB issues an NOA for the Low-Threat Waiver application package.
- Table 5.13-19 does not identify an agency contact name and phone number for dewatering permits because staff in the NPDES / Non-15 Permitting Unit rotate over time. The proposed Project site is located nearest to the Central Valley RWQCB's Sacramento office; Table 5.13-19 provides the correct contact information for the Sacramento office.

Table 5.13-19 provides a contact name and phone number for the Solano Irrigation District GSA (Paul Fuchslin, Director of Engineering, 707-455-4020); however, the GSA role under SGMA is for review and oversight only, and GSAs have no permitting authority. Table 5.13-19 has been revised (see Table 2 below) to provide contact information for Solano County Environmental Health (James Bezek, Director of Resource Management, 707-784-6765), under the Department of Resource Management, which is the sole permitting authority for well construction permits, and is also responsible for enforcing California Well Standards and California Water Code well permitting requirements, as well as local environmental health regulations. In accordance with County requirements, a complete Well Permit Application and fee would be submitted to the Environmental Health Division for review and approval prior to beginning work. Potential impacts to groundwater resources would be minimized or avoided through LID features, SWPPP BMPs, and Source Control Measures discussed under Impact HWQ-1.

Table 2 Revised Table 5.13-19 Agency Contacts for Water Resources

Issue	Agency	Contact
Stormwater discharges in non-federal waters – Order 2009-0009-DWQ, amended by Order 2010-0014-DWQ and 2012-0006-DWQ	Central Valley Regional Water Quality Control Plan (RWQCB) for the Sacramento and San Joaquin River Basins	Sacramento Office 11020 Sun Center Drive Suite 200 Rancho Cordova, California 95670 916-464-3291
Dredge and fill activities in non-federally jurisdictional wetlands and waterways – CWA Section 401; Porter-Cologne	Central Valley RWQCB	Sacramento Office 11020 Sun Center Drive Suite 200 Rancho Cordova, California 95670 916-464-3291
Water supply for the project would be produced from on-site groundwater well(s) within the Solano Subbasin – California Water Code Sections 13700-13806	Solano County Environmental Health Division – Technical Services, Department of Resource Management	James Bezek Director of Resource Management 675 Texas Street Fairfield, California 94533, 707-784-6765
Activities within the Solano Subbasin that could affect groundwater – Sustainable Groundwater Management Act	Solano Irrigation District (SID) Groundwater Sustainability Agency (GSA)	SID (Vacaville Office) Paul Fuchslin Director of Engineering 810 Vaca Valley Parkway Suite 201 Vacaville, California 95688 707-455-4020

6 Worker Safety

6.1 Data Requests DR WS-1 through DR WS-22

6.1.1 Data Request DR WS-1

DR WS-1: Provide a revised Table 5.10-5 to include the following, at minimum: BESS safety and fire protection standards, including the 2023 edition of NFPA 855; local fire department amendments to the California Fire Code requirements for electrical energy storage systems: Title 24, Part 9, Chapter 12, Section 1207; California Public Utilities Code Section 761.3(g) requirements for BESS safety.

Response: Table 5.10-5 in the Revised Section 5.10 Worker Safety Section has been updated to include the NFPA 855 2026 *Standard for the Installation of Stationary Energy Storage Systems* under the federal LORS and to include California Fire Code Title 24, Part 9, Chapter 12, Section 1207 and California Public Utilities Code Section 761.3(g) requirements under State LORS.

6.1.2 Data Request DR WS-2

DR WS-2: Provide a complete description of the proposed training provided to local emergency response agencies (e.g. fire department) during construction and operations. Provide a discussion of the content, frequency, and emergency scenarios to be covered in the training.

Response: A training for local emergency response agencies based on the Vaca Dixon Power Center Project Emergency Response Plan (Coffman Engineers 2026) (Updated ERP) would be prepared to address hazards inherent with lithium ion battery storage installations. The information contained within would be specific to the facility design, fire department access, Fire Alarm Control Panel (FACP) location, and other site information. A tactical response training could be provided by certified trainers if desired by the local emergency response agencies.

6.1.3 Data Request DR WS-3

DR WS-3: Provide a complete description of the proposed emergency response training provided to project personnel (workers and management) during operations should a fire or natural disaster occur (e.g., seismic event, wildfire, severe high winds) or should a failure incident involving a BESS enclosure occurs. Provide a discussion of the content, frequency, and emergency scenarios to be covered in the training, and delineate between management responsibilities and worker roles, such as with process flow diagrams.

Response: A training based on the Emergency Response Plan compliant with CCR Title 20, App B (g) (11) C, and Cal-OSHA Title 8, Section 3220, and NFPA 855 Section 4.3 would be provided to all Project personnel. Trainings would identify emergency risks and protocols as identified in the Emergency Response Plan and would be conducted periodically with new Project personnel receiving training prior to work. The Company Regional Manager would be responsible for ensuring that regular safety trainings occur and the O&M Manager would be responsible for facilitating trainings.

6.1.4 Data Request DR WS-4

DR WS-4: Provide a complete description of the proposed training programs for heat illness prevention and workers experiencing high heat weather (California Code of Regulations, title 8, sections 3395 and 3396 for Outdoor work environments and Indoor work environments, respectively).

Response: Title 8, Section 3395 and 3396 of the California Code of Regulations includes requirements that address heat illness prevention. As noted on page 5.10-4 of Section 5.10 of the Opt-In Application, heat illness prevention during general construction activities would be addressed in the Construction Injury and Illness Prevention Plan (IIPP) and Construction personal protective equipment (PPE) Programs. As noted on page 5.10-6 of Section 5.10, heat illness prevention during general Project operations would be addressed in the operation and maintenance (O&M) IIPP and O&M PPE Programs. Thus, the Project would comply with the requirements set forth in 8 CCR § 3395, et seq.

6.1.5 Data Request DR WS-5

DR WS-5: Provide a discussion of how each BESS facility's general arrangement would comply with the City of Vacaville Fire Department requirements for minimum separation and setback distances and would provide at least two emergency access points. For example, one of the two fire department access points at the Arges 400 MWh BESS is through the Vaca Dixon 57 MWh BESS and not through a public road. Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions, such as correspondence with the local fire department.

Response: The Applicant has developed a site plan in coordination with the local fire department, which utilizes two site access points to the Vaca Dixon site from County Road 393 (Kilkenny Road), and two site access points for the Arges site, one from County Road 393, and one connecting through to the Arges site (and therefore to either of the Vaca Dixon entry points). These sites utilize industry best practice for ring roads, interior roadways, and secured access.

The site plans also comply with the City of Vacaville Fire Department requirements on separation and setback distances. Coordination with the local City of Vacaville Fire Department is contained in emails and meeting minutes included as Appendix DR WS-1.

Revised Section 5.10.2.4, sub-section *BESS Safety and Fire Suppression,* references the City of Vacaville Fire Department requirements as well as the fire access points for each BESS.

6.1.6 Data Request DR WS-6

DR WS-6: Provide a discussion of how the separation distances between the BESS enclosures and the other nearest exposures comply with LORS (e.g., NFPA 855, California Fire Code, etc.) and would mitigate adverse impacts during an emergency response. For example, the draft Emergency Response Plan, Appendix S, describes a safe distance of at least 75 feet from battery enclosures, but site plans, Appendix C, appear to call out distances of less than 75 feet from enclosures to property lines. Provide a schematic, including equipment elevation views/details, that specify the distances between BESS enclosures and the other nearest exposures. Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

Response: The Updated Project Layout contained in the Project Description Update (CEC Docket TN #273054) shows the planned layout and placement of main equipment including BESS enclosures. ESS enclosure spacing include an 11-foot-6-inch aisle way spacing (face-to-face) and a 6-inch back-to-back spacing. PCS spacing to ESS enclosures include 8-foot spacing between PCS and BESS enclosures. Arges BESS enclosures would be located 55.3 feet from the property line at the nearest location and Vaca Dixon enclosures would be located 70 feet from the property line at the nearest location. The spacing of BESS enclosures is based on the UL9540A testing at full scale and is per NFPA 855 guidelines, as described in the Vaca Dixon BESS Hazard Mitigation Analysis (Coffman Engineers 2026) (Updated Vaca Dixon HMA) and the Arges BESS Hazard Mitigation Analysis (Coffman Engineers 2026) (Updated Arges HMA). Additionally, the BESS enclosures comply with the 2025 California Fire Code (CFC), including local amendments, on the minimum setback requirements of 10 feet from lot lines, public ways, combustible material and other exposure hazards (CFC 1207.8.3).

The Updated ERP lists measures related to a maintaining 75-foot standoff distance between individuals and incident enclosures whenever explosion conditions may be present as indicated by the enclosure and

site fire alarm control panels. Gates, access points, FACP, and staging areas on the Vaca Dixon and Arges sites have been designed to provide this standoff distance for first responders.

6.1.7 Data Request DR WS-7

DR WS-7: Provide a discussion of the anticipated time for project personnel to arrive onsite following an emergency or notification by the monitoring system.

Response: During operations, project facilities would not be continuously manned and utilize full-time remote monitoring. Each BESS enclosure is provided with an internal fire detection and alarm system, consisting of an internal FACP with two smoke detectors and two heat detectors within the main BESS container, as well as one smoke detector within the enclosure's integration cabinet. A site fire alarm control panel, referred to as a “Fire Command Center” (FCC), located in an approved location monitors all fire alarm signals from each BESS enclosure. BESS Status indicators will be visible at the FCC and the BESS container's associated FACP.

The BESS enclosures are under the control of a site Energy Management System (EMS) or Local Plant Controller (LPC), which in turn communicates with an off-site fleet controller, Supervisory Control and Data Acquisition (SCADA) operations center, or other third-party dispatch and monitoring entity. The BESS enclosure alarms will be forwarded to the remote operations, and remote operations or staff personnel on the site can shut down the BESS enclosure(s) remotely if determined necessary.

The time for staff to arrive onsite following an emergency or notification by the monitoring system is entirely dependent on the nature of the event. In the event of a notification by the monitoring system deemed not to be an emergency, personnel would be deployed on an as needed basis and the anticipated time for arrival would be based on the nature of the notification.

In the event of an emergency, when Project personnel are not present on site, the Emergency Response Coordinator would be contacted immediately. The Emergency Response Coordinator or an individual accredited in accordance with NFPA 70/70E and the National Electric Safety Code (NESC)(e.g., the O&M Manager) would be dispatched to the Project site immediately to interface with electrical equipment above 50 volts.

6.1.8 Data Request DR WS-8

DR WS-8: 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.).

Response: The BESS enclosures are designed with multiple internal fire protection systems, such as a fire detection and alarm system, a gas detection system, and a mechanical ventilation system. The enclosure also utilizes a multiple tiered battery management system that plays a central role in monitoring and safeguarding the health of the batteries and continuously tracks critical parameters, including voltage, temperature, and state of charge. Additional details are provided in the Updated Arges and Vaca Dixon HMAs and associated UL9540A test results.

6.1.9 Data Request DR WS-9

DR WS-9: Provide a schematic and complete description of the Fire Command Center (FCC) referenced in the draft Emergency Response Plan, Appendix S. Provide a discussion of the proposed local and remote monitoring capabilities (e.g., dedicated command and control center, thermal infrared cameras, air/water sampling plans) to aid the incident commander, local first response agencies, etc. during an incident involving a BESS enclosure. Provide a complete description of the battery energy storage management system for the proposed BESS enclosures.

Response: Fire Alarm Site Aggregation Drawings will be submitted to the Project docket the week of October 26, 2026. Discussions of the local and remote monitoring capabilities are included in the Updated Emergency Response Plan and Updated Arges and Vaca Dixon HMAs.

6.1.10 Data Request DR WS-10

DR WS-10: Provide a history of failure incidents involving the proposed BESS enclosures at the Vaca Dixon 57 MWh BESS facility, Risen SYL model #SU3794U3794KC, and at the Arges 400 MWh BESS facility, Risen SYL model #SU5016U1250KC. Provide a complete description of the proposed measures to prevent failure incidents for the proposed project.

Response: As noted in the Updated Project Description (CEC Docket TN #273054), the Project would utilize different enclosure than those included in the original application package. The Arges BESS facilities would utilize AESC HE-L5030A outdoor-rated ESS enclosures and the Vaca Dixon BESS facilities would utilize CATL CP1 ESS enclosures. The Applicant requested that the manufacturer provide documentation detailing the history of failure incidents involving the proposed BESS units. The manufacturer stated that there have been no major malfunctions of the proposed units. Measures to prevent failure incidents are included in the Fault Consequence Analysis of the Updated Arges and Vaca Dixon HMAs.

6.1.11 Data Request DR WS-11

DR WS-11: Provide the most current emergency response recommendations from the BESS enclosure manufacturer.

Response: Manufacturer emergency response recommendations are included in Appendix DR WS-2.

6.1.12 Data Request DR WS-12

DR WS-12: Provide a figure/diagram that depicts the interior design of each BESS enclosure (Risen SYL model #SU3794U3794KC and Risen SYL model #SU5016U1250KC) using the standard descriptions per UL 9540A e.g. cell and module, and per the manufacturer's user manuals e.g. cluster and array. Provide a glossary defining the terms used throughout the application, in particular related to the BESS components.

Response: Figures depicting interior design of each BESS enclosure are provided in Appendix DR WS-2. A glossary of the primary terms related to BESS components used throughout the application is provided in Table 3 below.

Table 3 Glossary of Terms

Term	Definition
Enclosure	Metal casing that houses and integrates power electronics, control systems, safety components, and battery assemblies, providing a defined volume for gas accumulation and ventilation control.
Unit	A unit is a higher-level battery assembly consisting of multiple modules electrically connected in series.
Module	A module is an intermediate battery assembly composed of a fixed configuration of cells, forming a discrete electrochemical subsystem with defined electrical and physical characteristics.
Cell	A cell is the fundamental electrochemical energy storage element (prismatic lithium-ion type) that generates voltage and releases gas during thermal runaway, forming the basis of module and higher-level assemblies.

6.1.13 Data Request DR WS-13

DR WS-13: Provide a schematic, equivalent to at least 30 percent design plans, and a complete description of the proposed fire protection systems for each BESS facility, such as the fire water loop, fire water storage tanks, fire pumps, fire hydrants, etc.

Response: Schematics displaying the proposed fire protection systems (e.g., fire water system) for each BESS facility are included in Updated Project Layout contained in the Project Description Update (CEC Docket TN #273054).

6.1.14 Data Request DR WS-14

DR WS-14: Provide a schematic, equivalent to at least 30 percent design plans, and a complete description of the proposed fire protection systems for all project buildings and structures, including the control enclosures, command and control center, etc.

Response: Diagrams of the gas detector wiring and fire suppression system for each BESS facility are included in Appendix DR WS-2. The aerosol extinguishing system described in the diagrams and plans will not be utilized.

6.1.15 Data Request DR WS-15

DR WS-15: Provide a schematic, equivalent to at least 30 percent design plans, and a complete description of the proposed fire detection and alarm systems for each BESS facility.

Response: Each BESS enclosure is provided with an internal fire detection and alarm system, consisting of an internal FACP with two smoke detectors and two heat detectors within the main BESS container, as well as one smoke detector within the enclosure's integration cabinet. A site fire alarm control panel, referred to as a “Fire Command Center” (FCC), located in an approved location, monitors all fire alarm signals from each BESS enclosure. ESS status indicators will be visible at the FCC and the BESS container's associated FACP. Additionally, each BESS enclosure is provided with an internal gas detection system, which continuously monitors the concentration of hydrogen within the enclosure and activates the mechanical exhaust system once concentration reaching 10% LFL. Diagrams of the fire suppression system for each BESS facility are included in Appendix DR WS-2.

6.1.16 Data Request DR WS-16

DR WS-16: Provide a schematic and complete description of the proposed fire suppression system that would exist in each BESS enclosure (Risen SYL model #SU3794U3794KC and Risen SYL model #SU5016U1250KC). Specify the applicable NFPA design standard (e.g. NFPA 2001 for clean agent, NFPA 2010 for aerosol, etc.) and the proposed fire extinguishing agent. Provide a discussion of why a fire suppression system was chosen. Provide references for all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.

Response: For updated battery designs, fire extinguishing agents (e.g., aerosol or clean agent) would not be utilized. Diagrams of the fire suppression system for each BESS facility are included in Appendix DR WS-2.

6.1.17 Data Request DR WS-17

DR WS-17: Provide draft outlines of the project’s Fire Prevention Plan for construction and operations. Provide a discussion of project-specific potential fire hazards, control procedures, fire protection systems, etc.

Response: The Fire Prevention Plan (FPP) is an OSHA-defined, location specific document addressing hazards, fuel sources, materials, and procedures for mitigation and prevention. The project

documentation, as part of the code-required documentation pertaining to BESS facilities, includes the HMA (CFC 1207.1.4, and NFPA 855, 4.4.1). Together with the Emergency Action Plan (or Emergency Response Plan, ERP, NFPA 4.3), these two documents contain all required information typically included in the OSHA defined FPP. At this time, the Updated Emergency Response Plan and Updated Arges and Vaca Dixon HMAs contain information anticipated to be included in the Fire Prevention Plan including discussions of potential fire hazards, control procedures, and fire protection systems.

6.1.18 Data Request DR WS-18

DR WS-18: 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 e.g. exhaust ventilation, gas detection systems, etc.

Response: A schematic displaying the emergency and standby power systems, including descriptions of what they serve, are included in Appendix DR WS-2.

6.1.19 Data Request DR WS-19

DR WS-19: Provide a complete description of the proposed fuel management and handling during both construction and operations, including details on fuel delivery and distribution methods and systems, containment systems, and fire protection measures to be implemented (e.g. static electricity mitigation, etc.).

Response: The Applicant would implement a comprehensive hazardous materials management program. All plans would be prepared prior to construction mobilization, implemented throughout construction, and maintained or updated during operation, as applicable. A 1,000 to 3,000-gallon diesel storage tank would be used during construction. All deliveries and refueling would occur in designated, attended areas with secondary containment, bonding and/or grounding, and overfill protection incorporated. Routine inspections, delivery and maintenance logs, and spill reporting procedures would be required. Fueling and refueling procedures would apply to all bulk fuel deliveries and mobile refueling events associated with construction equipment, vehicles, and generators. Procedures would designate fueling zones and hours, require attended fueling only, and establish bonding and grounding requirements, overfill prevention measures, spill pans or drip trays, delivery acceptance checklists, equipment and hose inspections, nozzle auto-shutoff use, and no-smoking policies. Vendor requirements and loading/unloading protocols would also apply. Compliance would be confirmed through maintained delivery logs. The Project safety representative would oversee implementation, incident response, recordkeeping, and regulatory notifications. Fuel would not be utilized during operations.

6.1.20 Data Request DR WS-20

DR WS-20: Provide a fire water supply analysis to confirm adequate water supply for each BESS facility, including results of flow tests. Provide a discussion of the project's worst-case fire flow requirements in GPM (gallons per minute) 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.

Response: As discussed in the Project Description Update (CEC Docket TN #273054), the Project would source fire water from an onsite groundwater well. A Groundwater Feasibility Study (CEC Docket TN #271961) was prepared to analyze the expected groundwater production and capacity. A 120,000 gallon fire water storage tank would be utilized to store water for emergency use. Additional coordination with the City of Vacaville Fire Department is needed in order to determine appropriate fire flow requirements.

6.1.21 Data Request DR WS-21

DR WS-21: Provide the UL 9540A cell, module, unit, and installation level test reports in accordance with the 2025 edition of UL 9540A and the 2025 California Fire Code Section 1207.1.7 for the proposed BESS enclosure at the Vaca Dixon 57 MWh BESS facility, Risen SYL model #SU3794U3794KC.

Response: The UL9540A certificate and test reports in accordance with the 2025 edition of UL 9540A and the 2025 California Fire Code Section 1207.1.7 for the Vaca Dixon 57 MWh BESS facility is included in the updated Arges and Vaca Dixon HMAs.

6.1.22 Data Request DR WS-22

DR WS-22: Provide the UL 9540A cell, module, unit, and installation level test reports in accordance with the 2025 edition of UL 9540A and the 2025 California Fire Code Section 1207.1.7 for the proposed BESS enclosure at the Arges 400 MWh BESS facility, Risen SYL model #SU5016U1250KC. Provide the UL 9540 certificate of compliance for the proposed BESS enclosure at the Arges 400 MWh BESS facility, Risen SYL model #SU5016U1250KC.

Response: The UL9540 certificate and UL9540A test reports in accordance with the 2025 edition of UL 9540A and the 2025 California Fire Code Section 1207.1.7 for the Arges 400 MWh BESS facility is included in the updated Arges and Vaca Dixon HMAs. Also included is the UL1973 Certifications and LSFT reports for both the Arges (LSFT).

Appendix DR LAND-1

Lease Option Agreement and Ground Lease

Appendix DR LAND-1 is being submitted separately, as a confidential filing.

Appendix DR WS-1

City of Vacaville Fire Department Coordination

Appendix DR WS-1

City of Vacaville Fire Department Correspondence

Outlook

[EXT] FW: Vaca Dixon Power Center BESS -- UPDATED Site Layout and Water Supply Review

From Robert Ray <rray@patchservices.com>
Date Mon 1/5/2026 11:56 AM
To Jill Childers <jill.childers@cityofvacaville.com>; Daniel DeCaro <daniel.decaro@cityofvacaville.com>; Alex Nourot <alex.nourot@cityofvacaville.com>
Cc Jon Boyer <jboyer@mrpgenco.com>; Christopher Lopez <clopez@mrpgenco.com>; Adam Morrison <amorrison@rinconconsultants.com>; Katherine Green <kgreen@rinconconsultants.com>; Fortner, Robin <robin.fortner@coffman.com>; Wicker, Pat <pat.wicker@coffman.com>; Zafer, Mitch <mitch.zafer@coffman.com>

4 attachments (3 MB)

VDPC BESS_VFD Mtg Notes_11.18.25.pdf; Vaca Dixon - Coffman Site Fire Flow Memo_121125.pdf; RE_ Vaca Dixon Power Center BESS -- Vacaville City Water Supply Questions_112525.pdf; MRP_VACA ARGES_SP-100-REV B2_121825.pdf;

CAUTION: This email originated from outside of Rincon Consultants. Be cautious before clicking on any links, or opening any attachments, until you are confident that the content is safe .

Jill, Team—

Please see the updated Site Plan dated 12/18/25 which was issued after the email was sent out on 12/16/25. The attached version (SP-100-REV B2_121825) includes more complete revisions in response to comments received from Jill at our meeting on 11/18/25. My apologies for the late transmittal on this important item.

Robert Ray
Project Director
Patch Services
805.451.4262

From: Robert Ray
Sent: Tuesday, December 16, 2025 12:26 PM
To: Jill Childers <jill.childers@cityofvacaville.com>; Daniel DeCaro <daniel.decaro@cityofvacaville.com>; Alex Nourot <alex.nourot@cityofvacaville.com>
Cc: Jon Boyer <jboyer@mrpgenco.com>; Christopher Lopez <clopez@mrpgenco.com>; Adam Morrison <amorrison@rinconconsultants.com>; DeMasi, Tom <tom.demasi@coffman.com>; Fortner, Robin <robin.fortner@coffman.com>
Subject: Vaca Dixon Power Center BESS -- Site Layout and Water Supply Review

To: Jill Childers, Vacaville Fire Marshal
Daniel DeCaro, Engineering Project Coordinator, Utilities Dept.

This email is a follow up to our previous meeting with the City Fire Dept on November 13 and associated follow up correspondence with the City Utilities Department.

Key items discussed at the on November 13 included City Fire comments on the Site Plan and questions regarding the water supply at the project site.

Find attached:

1. Meeting Notes from the 11/13/25 meeting with Vacaville Fire
2. Revised Site Plan in response to City Fire comments
3. Correspondence with the City Utilities Dept including preliminary City modeled water supply flow estimates (gpm) at the site (11/25/25)
4. Coffman Engineers assessment memo (12/11/25) of project type and fire flow considerations at the site and a request to reduce the minimum required fire-flow at the site from 4,500 gpm to 2,750 gpm

The Hazard Consequences Analysis (including plume modeling), Hazard Mitigation Plan, and Emergency Response Plans are in progress and will be provided in the near future. Preliminary modeling results indicate that emissions of potential concern would not reach I-80 above applicable safety thresholds. The preliminary results of the consequence analysis show that the maximum distance of levels of concern is 23 feet based on Carbon Monoxide. The nearest receptor (ESS enclosure to site fence) is located approximately 30 feet away – i.e., preliminary PHAST modeling results indicate that levels of concern would not reach the site fence.

We would like to get your comments on the revised site plan and the request to reduce the minimum required fire flow at the site. Please let us know if you have any questions. We are available to setup a Microsoft Teams call to discuss if you are available.

Thank you for your time and efforts on this project.

Robert Ray
Project Director
Patch Services
805.451.4262

Middle River Power
Vaca Dixon BESS LLC
Arges BESS LLC

City of Vacaville Fire Department Meeting Notes
Vaca Dixon Power Center Project
630 Merchant St., Vacaville, CA 95688
November 13, 2025, 8:30 – 10:00 a.m.

Participants

Vacaville Fire Department

- Alex Nourot, Deputy Chief (707.469.4284)(alex.nourot@cityofvacaville.com)
- Jill Childers, Fire Marshal (707.449.5482)(jill.childers@cityofvacaville.com)

Middle River Power Team Representatives

- Jon Boyer, Director of Environmental, Health, & Safety(760.912.3007)(jboyer@mrpgenco.com)
- Maribeth Sawchuk, Project Partnerships (703.626.1119)(maribeth@enermatters.com)
- Tom DeMasi, Senior Fire Protection Engineer (310.748.7283)(tom.demasi@coffman.com)
- Robert Ray, Permitting Director (805.451.4262)(rray@patchservices.com)

Agenda

- Introductions
- Project Overview/Review of Site Plan
- Safety Features
- Local Partnerships
- Q&A

Handouts

- Presentation (18 pages)
- Preliminary Site Plan

Key Meeting Notes

Jill Childers' Site Plan Related Questions

- Is there a possibility of separate ownership for the VD 57 and Arges 400 MWh BESS projects? If so, might require separate fire water systems. The fire protection agreement will need to consider how maintenance, etc. will be done if separate ownership. [Note: Jon Boyer replied separate ownership is possible. Vaca Dixon BESS LLC will likely sublease to Arges BESS LLC. The land will be leased, not owned by the Project.]
- Any fire water pipeline connection will need to be NFPA 24 compliant with regards to bury depth.

- Need to refine Site Plan or provide a fire plan to show more details, including setbacks and access road turning radii, electrical disconnects (note: see Draft City BESS Ordinance for setbacks too).
- Need to add secondary access for the Arges BESS component; currently show two roads for VD 57 but only one for Arges. The second access could be added off of the VD site.
- Make sure that the separation between batteries is NFPA 855 (Standard for the Installation of Stationary Energy Storage Systems) compliant and provide justification for separation distances used.
- The current design includes fire water loops and 6 hydrants.
- Will the entrance gates be automatic or manual? [Response; yes intent is to provide automatic gates with knox boxes and combinations, etc. More detail to be provided by applicant.] VFD clarified that they have Knox switches for automatic gates that need to be coordinated.
- What level of event will VFD be responsible to respond to? (Response: Signals from the ESS will go through the remote operations center (ROC), and for battery abnormal conditions it would not be the intent to have the VFD respond. The level of event, i.e., ESS fire, can be coordinated with the department and documented in the Emergency Response Plan.)
- Questions re: City water supply facilities and connection options should be directed to Daniel DeCaro in the City Utility Dept.

<u>Tom DeMasi Safety Overview</u>

- Presented overview of Fire Protection within SYL battery enclosures including fire prevention and suppression components (see handout for more detail).
- The VD 57 batteries passed the UL 9540A without need for application of internal built in fire suppression systems (but will be provided with suppression systems clean agent or aerosol depending on the site, and come pre-manufactured with a sprinkler system and FDC. It was clarified that it is not the intent to connect the fire sprinkler system to a public water supply)
- Overview of applicable codes and standards (see handout for more detail). Project will be NFPA 855 and CFC Section 1207 compliant.
- Hazard mitigation. Studies to be included with AB 205 application to the CA Energy commission to include: Hazard Mitigation Analysis, HCA Plume Analysis, and Emergency Response Plan.
- Fire response and fire fighting recommendations noted in IAFC documents and industry standard is to let unit burn out and provide supporting streams to adjacent structures for cooling if needed.

<u>Jill Childers' Safety Related Questions</u>

- Make sure plume modeling includes consideration of wind in area and the proximity of I-80; this is and will be a big concern.
- Does Coffman/applicant have SYL battery fire history data for the selected batteries? Please research and provide to Jill.

- If the monitoring system detects heat and/or smoke will the Vacaville Fire Dept be notified directly? [Tom responded that the current plan is to not notify the VFD for a single module thermal runaway no fire event if it can be handled by the management systems and MRP staff. Jon added that the operations center will be at the Tracy Combined Cycle Plant.]
- Would water be used for fire suppression? [Tom response: external yes in a life safety event; internal not as part of the systems for a thermal runaway event, only clean agent/aerosol]
- How would fire water be contained and disposed of if contaminated? [Jon responded that this is not anticipated to be applicable but runoff would discharge the stormwater management areas [detention basins] for each project. The current design does not include connecting the enclosures to the public water supply although the units come ready for hookup. MRP to provide guidance if fire water should be collected, stored, and profiled as a potentially hazardous waste.]
- Project plans to provide training to fire department/first responder personnel prior to operation and then on an annual basis at the site.
- Jill stated that she plans to bring hazmat team reps into the discussions and project design review going forward.
- Jill noted that the VFP also enforces Noise Code.
- Given the VFD's concern about potential plume impacts on I-80, the following post-meeting information has been provided. The preliminary HCA plume analyses indicate that emissions of potential concern for both BESS projects would not impact I-80 and/or extend offsite past the property line. The preliminary results of the consequence analysis show that the maximum toxic endpoint distance for CO is 23 feet for Arges and 22 feet for VD 57. The minimum distances from the battery enclosures to the perimeter fence are 30 feet and 35 feet for the Arges and VD57 facilities, respectively. The closest distance from the battery enclosures to the I-80 right of way to the north is approximately 165 feet and over 190 feet to the southern edge of the paved roadway.

<u>Maribeth Sawchuk's Community Engagement and Benefit Discussion</u>

- Identification of stakeholders.
- Electrical system reliability benefits.
- Economic benefits.
- Summary of outreach to date and ongoing outreach and development of Community Benefits Program, including City of Vacaville and Solano County organizations.
- Maribeth donating her time to help raise awareness and fund raising at local level.

<u>Jill Childers' Community Related Input</u>

- The community is aware of this project as well as the nearby Corby project
- Lots of interest and concern by the community related to the locations of the BESS projects; community believes that the current locations are not appropriate.
- The City's draft BESS Ordinance has setbacks that are more restrictive than NFPA; directed applicant to review the draft ordinance and comply as feasible.

- Jill recommended reaching out to the Community Development Department to get their input.
- Jill asked when the first Public Meeting is planned? [R. Ray and J. Boyer responded not until after the pending AB 205 Application is submitted (planned by end of year) and deemed complete by the CA Energy Commission (will be at least several months following application submittal).

Follow Up Action Items

- Applicant review VFD comments.
- Applicant review draft City BESS Ordinance and revise Site Plan setbacks to comply et al as feasible.
- Revise/update Site Plan to address VFD comments, including addition of second access road for Arges BESS component and annotate Site Plan access roads with turning radii and add supplemental separation and setback distances.
- Applicant coordinate with City Utility Department and further develop fire water supply plan.
- Applicant research SYL battery fire history and provide to Jill.
- Applicant will provide copy of draft Emergency Response Plan for VFD.
- Set up follow up meeting with VFD for early December to provide updates and status report on VFD requested Site Plan changes.
- MRP to provide guidance if fire water should be collected, stored, and profiled as a potentially hazardous waste.

Appendix DR WS-2

BESS System Drawings and Manufacturer Recommendations

Appendix DR WS-2 is being submitted separately, as a confidential filing.