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RB INYOKERN DATA CENTER

Application for Small Power Plant Exemption (SPPE)

Inyokern, Kern County, California

Docket Number – 26-SPPE-01

RB Inyokern Data Center - Applicant Responses to Data Requests Set 2

October 23, 2026

Elizabeth Huber
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Response to Data Requests Set 2, RB Inyokern Data Center (26-SPPE-01)

Dear Ms. Huber:

On behalf of R&L Capital, Inc., the undersigned submits the enclosed responses to CEC Data Requests Set 2, dated September 25, 2026, for the RB Inyokern Data Center (Docket No. 26-SPPE-01).

Responses to all data requests are provided in the enclosed response document, organized by resource area consistent with the Data Requests Set 2 format. Supplemental documents referenced within the responses have been submitted separately to the CEC docket via the project portal and assigned new Transmittal Numbers identified within the applicable responses. In addition, certain materials are transmitted to CEC staff via the CEC Kiteworks portal: the confidential cultural resource records, submitted under confidential cover consistent with the treatment of Confidential Appendix M; the project geospatial data; and the electronic air quality and greenhouse gas modeling files. Where information is not yet available at the conceptual design stage, responses identify the relevant items and commit to providing supplemental information upon completion of final engineering consistent with Section 3.2 of the Main Application (TN 269893).

The Applicant remains committed to supporting CEC staff's timely completion of its environmental review and is available to discuss any questions regarding the enclosed responses.

Respectfully submitted,

Kyle Mohr
Representative
On behalf of R&L Capital, Inc.

Enclosure:
Data Response Set 2 — RB Inyokern Data Center (26-SPPE-01)

AIR QUALITY AND PUBLIC HEALTH
Authors: Brewster Birdsall, Rachael Dal Porto

BACKGROUND: Transmittal of Electronic Modeling Files
In response to CEC staff's Data Requests Set 1, the applicant provided the revised Air Quality Impact and GHG Analysis (AQIA) as SPPE application Appendix F Supplement — Section F.1 (TN 271094, 6/29/2026) along with a collection of over 600 megabytes (600 MB) of electronic modeling files. The collection of AQIA dispersion modeling and health risk assessment (HRA) files did not contain an index or 'readme' to aid navigation. Staff needs to be able to trace the AQIA results from the modeling work.

Staff conducted a preliminary review of the updated electronic dispersion modeling files and found the provided files do not clearly support the data tabulated in the AQIA (TN 271094, 6/29/2026) or some of the statements in the Responses to DR Set 1 (TN 271129, 7/1/2026). At this time, staff remains unable to identify the specific dispersion modeling output files that correlate with each of the air pollutant dispersion modeling results tabulated in the AQIA.

DATA REQUESTS
DR AQ-18. Please provide an index of dispersion modeling and HRA modeling file folder names with a brief description of the contents.

R&L Response

DR AQ-18. An index of the dispersion modeling and health risk assessment (HRA) modeling file folders, with a description of each folder's contents, is provided in the Air Quality Impact Analysis Supplement, Response to DR AQ-18 (TN 273187). The modeling files are organized into the AAQA screening runs (operational pollutants at averaging periods shorter than annual, operational pollutants at the annual averaging period, and construction), the refined dispersion runs (NO2 1-hour for the NAAQS and the CAAQS, PM10 24-hour, and PM10 annual, each including the alternative load cases), and the HRA files (the AERMOD inputs and the HARP health risk runs for each operating load and for construction). Within each AERMOD folder, the plot (.AD) subfolder contains the reported concentrations, and within each HARP load folder the hra subfolder contains the risk results. The complete electronic modeling file set is provided to CEC staff via the CEC Kiteworks portal.

DR AQ-19. Please identify the filenames of the specific dispersion modeling output that are the source of each of the dispersion modeling results tabulated for the Project impacts (predicted concentrations) in AQIA Tables 4-8, 4-9, 4-10, 4-11, 4-12 and 4-13
(TN 271094).

R&L Response

DR AQ-19. The filenames of the specific dispersion modeling output that are the source of each predicted concentration tabulated in AQIA Tables 4-8, 4-9, 4-10, 4-11, 4-12, and 4-13, as presented in the updated Air Quality Impact Analysis, are identified in the Air Quality Impact Analysis Supplement, Response to DR AQ-19, Table 1 (TN 273187). Table 1 lists, for each pollutant and averaging period, the corresponding model run and plot file. The referenced electronic output files are provided to CEC staff via the CEC Kiteworks portal.

DR AQ-20. Please tabulate the names of the modeled source(s) that cause the Project impacts (predicted concentrations) for each pollutant and averaging time of the "refined" results in AQIA Table 4-10 (TN 271094).

R&L Response

DR AQ-20. The modeled sources that cause the predicted concentrations for each pollutant and averaging time of the refined results in AQIA Table 4-10 are tabulated in the Air Quality Impact Analysis Supplement, Response to DR AQ-20, Table 2 (TN 273187). As shown in that table, the refined NO2 1-hour impacts (CAAQS and NAAQS) are driven by an emergency generator stack together with the area and energy sources and mobile sources, and the refined PM10 24-hour and annual impacts are driven by an emergency generator stack together with both cooling towers, the area and energy sources, and mobile sources. Table 2 identifies the specific model run and plot files associated with each.

DR AQ-21. Please name the dispersion modeling file(s) that use the applicant's "three- tier grid" for receptor spacing and a total "of 2,259 discrete off-site receptors" as described in AQIA pg. 4-16 and SPPE Application p. 212 (TN 269893). If AQIA results were drawn from modeling with narrower or smaller grids, please explain why the "three-tier grid" for receptor spacing and 2,259 discrete off-site receptors was not used.

R&L Response

DR AQ-21. The three-tier receptor grid of 2,259 discrete off-site receptors was used in the AAQA screening modeling runs, AAQA2 (operational pollutants at averaging periods shorter than annual) and AAQAYear2 (operational pollutants at the annual averaging period), as identified in the Air Quality Impact Analysis Supplement, Response to DR AQ-21 (TN 273187). The screening runs establish which pollutants and averaging periods require refined modeling and identify where the maximum concentration occurs and where it drops off across the grid.

Based on the screening results, the pollutants and averaging periods carried into refined modeling were NO2 1-hour, PM10 24-hour, and PM10 annual. For the refined runs, the receptor grid was focused on the area where the screening run located the maximum concentration, using 25 meter spacing throughout that area. The NO2 1-hour maximum occurred in the first row of the second tier with a clear drop off before the third tier, so the refined NO2 1-hour runs used a 300 meter fenceline grid at 25 meter spacing (1,311 receptors). The PM10 24-hour and annual maxima occurred at the receptors closest to the Project Site with a clear drop off before the second tier, so the refined PM10 runs used the 100 meter fenceline grid at 25 meter spacing (332 receptors). In each refined run, the concentrations were reevaluated to confirm a consistent drop off before the edge of the grid, confirming the maximum concentration was captured. The Project's refined PM10 impacts are below the applicable SJVAPCD significant impact level. The associated modeling files are provided to CEC staff via the CEC Kiteworks portal**.**

DR AQ-22. Please name the dispersion modeling and post-processing file(s) that arrive at the health risk results for cancer risk during alternative loads and show that: "Cancer risk decreases consistently from 4.89E-06 at 100% load to 1.83E-06 at 10% load" as described in Response to DR AQ-12.

R&L Response

DR AQ-22. The dispersion and post-processing files that produce the operational cancer risk results at each alternative load are identified in the Air Quality Impact Analysis Supplement, Response to DR AQ-22, Table 3 (TN 273187). Based on the updated modeling parameters and warm-up times, the operational cancer risk decreases consistently with load, from 5.37E-06 at 100 percent load to 1.06E-06 at 10 percent load, with the maximum at 100 percent load remaining below the 10 in one million significance threshold. Table 3 identifies, for each load, the HARP model run and risk file that produce these results. The associated modeling files are provided to CEC staff via the CEC Kiteworks portal.

BACKGROUND: Follow-up to Construction-Phase Emissions Revisions
In Response to DR AQ-6 through DR AQ-8, and in AQIA Table 4-3 (TN 271094), the applicant provided a revised construction emissions analysis showing construction- phase PM10 and PM2.5 emissions would be greater than originally filed with the SPPE Application. With construction emissions updated recently, staff expects the ambient air quality impact analysis and construction-phase dispersion modeling to also be updated, yet these results in AQIA Tables 4-12 and 4-13 do not appear to be updated.

DATA REQUEST
DR AQ-23. Please identify the specific dispersion modeling output files that reflect the construction emissions analysis and emissions rates shown in AQIA Table 4-3 (TN 271094), which were revised by Response to DR AQ-6 through DR AQ-8. Please also update AQIA Tables 4-12 and 4-13 accordingly.

R&L Response

DR AQ-23. The revised construction emissions analysis is documented in the updated Air Quality Impact Analysis and its supporting files, as identified in the Air Quality Impact Analysis Supplement, Response to DR AQ-23 (TN 273187). The revised construction emissions shown in AQIA Table 4-3 are calculated in CalEEMod, with the input file and detailed output report provided in Appendix A. The construction ambient air dispersion analysis is contained in the AAQAConst2 modeling files (Appendix C), and the construction health risk files are contained in the HARP CONSTRUCTION folder within the InyoDataAlt2 files (Appendix B). AQIA Tables 4-12 and 4-13 have been updated to reflect the revised construction emissions and continue to demonstrate that the maximum construction impacts, considered together with background concentrations, are below the applicable ambient air quality standards. The associated electronic modeling files are provided to CEC staff via the CEC Kiteworks portal.

BACKGROUND: Modeling Nitrogen Dioxide (NO2) 1-Hour Impacts
The applicant's modeling files (NO2ARMALT.ADO) indicate that the evaluation of the project's 1-hour NO2 impact uses a default special processing procedure applicable to the 1-hour NO2 NAAQS, and this is automatically enabled in AERMOD through the setting "POLLUTID NO2." In contrast with NO2 NAAQS, the 1-hour NO2 California Ambient Air Quality Standard (CAAQS) requires evaluation of maximum 1-hour concentrations, without special processing that applies to the NAAQS. The CAAQS values for NO2 are not to be exceeded. Using the federal NO2 processing procedure in AERMOD would underestimate the highest 1-hour NO2 concentrations that must be considered in the evaluation of exceedances against the 1-hour NO2 CAAQS.

DATA REQUEST
DR AQ-24. Please confirm that the applicant's refined analysis for the 1-hour NO2 CAAQS provides a conservative result that matches or exceeds the result that would otherwise be obtained from AERMOD with the setting "POLLUTID NO2 H1H." If not, please reevaluate 1-hour NO2 ambient air quality impacts using "POLLUTID NO2 H1H."

R&L Response

DR AQ-24. Confirmed. The refined 1-hour NO2 CAAQS analysis was performed as a separate modeling run (NO2ARMALTCA2) in which the NAAQS special processing was disabled and the highest 1-hour concentration (H1H) was evaluated, consistent with the CAAQS requirement to evaluate maximum 1-hour concentrations. Because this run directly applies the highest 1-hour (H1H) form, it provides a result that matches or exceeds the result that would be obtained from AERMOD using the setting POLLUTID NO2 H1H. The supporting modeling run is described in the Air Quality Impact Analysis Supplement, Response to DR AQ-24 (TN 273187), and the associated modeling files are provided to CEC staff via the CEC

Kiteworks portal.

BACKGROUND: Follow-up to Screening for Low-Load Conditions
For criteria pollutant impacts at various loads, responses to DR AQ-13 and AQ-14 indicate that a screening review of "varying loads and warm-up conditions were also considered in the ambient air quality and health risk analyses" including dispersion modeling for short-term (1-hour) NO2 ground level concentrations and health risks. However, staff has not located any summary of the resulting NO2 concentrations or health risks during the different loads.

DATA REQUEST
DR AQ-25. Please provide a spreadsheet or summary table of the NO2 1-hour ground level concentrations and of health risks from diesel particulate matter (DPM) modeled under the alternative load scenarios to confirm the use of 100% load as a conservative assumption. This response should also provide a direct reference to the modeling files where these concentrations and health risk results may be found.

R&L Response

DR AQ-25. The NO2 1-hour ground level concentrations and the diesel particulate matter (DPM) health risks modeled under the alternative load scenarios are provided in the Air Quality Impact Analysis Supplement, Response to DR AQ-25 (TN 273187), in Table 4 (NO2 1-hour concentrations by operating load) and Table 5 (operational cancer and chronic risk by operating load). These results confirm that the 100 percent load case produces the maximum impact for each measure and is therefore the conservative assumption: the NO2 1-hour CAAQS concentration decreases from 116.1 micrograms per cubic meter at 100 percent load to 31.1 at 10 percent load, the operational cancer risk decreases from 5.37E-06 to 1.06E-06, and the chronic hazard index decreases from 1.08E-03 to 3.12E-04. Even at the 100 percent load maximum, the refined NO2 1-hour impact, considered together with existing background concentrations, remains below the 1-hour NO2 CAAQS of 339 micrograms per cubic meter and is less than significant, consistent with the refined results in AQIA Table 4-10. Tables 4 and 5 identify the modeling run and plot or risk files for each result, and the associated modeling files are provided to CEC staff via the CEC Kiteworks portal.

BACKGROUND: Emissions Control Device - Warm Up Duration
Vendor documentation of SCR warm-up periods appears to be missing. Applicant's Response to DR AQ-17 restates the "engine outlet temperatures" and the assumptions of "warm-up periods ranging from 7 minutes to 21 minutes depending on load point". The Response to DR AQ-17 also refers to Johnson Matthey drawings (i.e., Drawing No. 202-C0039989 Revision B), which show the general arrangement of the SCR components. The Johnson Matthey drawings do not appear to present any documentation on the duration of time needed for the SCR to achieve operable system temperatures. Without project-specific confirmation of the warm-up durations from the SCR vendor, staff would assume the SCR device takes about 15 minutes to warm up.

DATA REQUEST
DR AQ-26. Please provide vendor documentation to verify the duration (in minutes) for the warm-up period that allows the SCR to reach Tier 4 emission rates for all full-load and low-load cases.

R&L Response

DR AQ-26. The SCR warm-up period was verified with the generator vendor. The vendor documentation states that warm-up time varies with ambient temperature, particularly during the cold season, and estimates a warm-up time of approximately 15 to 30 minutes under load. To be conservative, the analysis applied a 30 minute warm-up time for all full-load and low-load cases. The vendor documentation verifying the warm-up

duration is provided in Appendix A Supplement, Section A.3 Generator Data and Specifications (TN 273188).

BACKGROUND: SCR Design and Outlet Diameter
Modeled stack exit velocities appear to be excessively high, and the velocity parameter triggers multiple warning messages shown in the AERMOD modeling files output reports. Staff is concerned that the applicant overestimated the stack exit velocities by assuming that each engine exhaust stack is 12-inches in diameter. Responses to DR Set 1 refer to Johnson Matthey drawings (i.e., Drawing No. 202-C0039989 Revision B) that show general arrangement of the SCR components. The Johnson Matthey drawings show the SCR inlet and outlet would use a gasket kit of 30-inches in diameter, and this implies that the SCR outlet diameter would also be roughly 30-inches. Staff needs confirmation that the stack diameters and velocities in the AQIA were accurately representative of the proposed SCR design.

DATA REQUEST
DR AQ-27. Please provide vendor drawings or documentation confirming the general arrangement of the SCR including the SCR outlet diameter and the air pollutant release velocities for each of the engines. If the SCR outlet diameter and air pollutant release velocities confirmed via vendor drawings differ from that used in the AERMOD modeling files, please provide updated modeling outputs with the correct diameters and release velocities.

R&L Response

DR AQ-27. The SCR general arrangement has been documented with the generator vendor. The vendor provided an estimated SCR exhaust outlet diameter of 30 inches and a preliminary stack height of approximately 29 feet. The AERMOD modeling files have been updated to reflect the 30 inch outlet diameter, with the air pollutant release velocities recalculated within the model from the vendor flow rates for each load, and to reflect the approximately 29 foot stack height. The vendor documentation is provided in Appendix A Supplement, Section A.3 Generator Data and Specifications (TN 273188), and the updated modeling outputs are incorporated into the updated Air Quality Impact Analysis (TN 273187), with the associated electronic modeling files provided to CEC staff via the CEC Kiteworks portal.

CULTURAL AND TRIBAL CULTURAL RESOURCES
Authors: Lauren DeOliveira and Michael Hoke

BACKGROUND: Records Search Results
CEC staff has reviewed the docketed information for this project (RLC 2026b; 2026c, 2026d, 2026e, 2026s, 2026t) and has found Confidential Appendix M does not include the full records search results as required by Appendix B (g) (2) (B). Neither Department of Parks and Recreation 523 (DPR 523) forms of previously identified cultural resources nor copy of previously conducted technical studies covering the project area or buffer are included.

DATA REQUESTS
DR CUL-8. Please provide copies of all DPR 523 forms for cultural resources (ethnographic, architectural, historical, and archaeological) identified in the 1-mile literature search.

R&L Response

DR CUL-8. Copies of the Department of Parks and Recreation 523 (DPR 523) forms for all 49 cultural resources identified in the one-mile literature search are transmitted to CEC staff as confidential cultural resource records via the CEC Kiteworks portal, indexed to the South San Joaquin Valley Information Center (SSJVIC) Resource List (File No. 26-001).

DR CUL-9. Please provide copies of all technical reports whose survey coverage is wholly or partly within 0.25 miles of the area surveyed for the project or which report on any archaeological excavations or architectural surveys within the literature search area.

R&L Response

DR CUL-9. Copies of all technical reports with survey coverage wholly or partly within 0.25 mile of the area surveyed for the Project, and all technical reports documenting archaeological excavations or architectural surveys within the one-mile literature search area, are transmitted to CEC staff as confidential cultural resource records via the CEC Kiteworks portal, indexed to the South San Joaquin Valley Information Center (SSJVIC) Report List (File No. 26-001).

BACKGROUND: Archaeological Technical Study
CEC Staff have reviewed the application and docketed technical studies for this project (RLC 2026b; 2026c, 2026d, 2026e, 2026s, 2026t) and has found that the archaeological technical study is missing a survey coverage map Please provide the following in accordance with CEQA Appendix B (g)(2)(C):

DATA REQUESTS
DR CUL-10. Please provide a survey coverage map depicting all areas surveyed including the project site, project linear facility routes, and all buffers.

R&L Response

DR CUL-10. A survey coverage map depicting all areas surveyed for the Project is provided to the Commission as Appendix B Supplement, Section B.1 Survey Coverage Map (TN 273189), which presents the survey coverage figure (labeled Appendix C) for the Phase I Survey (TN 269595). The map shows survey coverage across the approximately 95 acre study area that, as defined in that report, comprises the Project's components and a 200 foot buffer.

EFFICIENCY AND ENERGY RESOURCES
Author: Ardalan Sofi, Ph.D., P.E.

BACKGROUND: Electrical One-Line Diagram to Verify Generating Capacity
The applicant provided the "Technical Description, Emergency Generating System – Aggregate Power Limiting" letter dated September 9, 2026. In the letter, the applicant describes the generator configuration as consisting of 38 primary generators and 2 redundant generators. In addition, the applicant proposes a power-limiting system to physically limit the aggregate real power output of the emergency generating system to below 100 megawatts (MW), specifically to 99 MW. The proposed limiting system includes hardwired protective relays and control elements associated with the generator yards and medium-voltage switchgear that are intended to prevent the generating system from exceeding the 99 MW limit. The letter states the following deliverables would be provided: generator control and power limiting functional description, facility electrical load summary, and commissioning and functional test protocol.

Staff requires the electrical one-line diagram to verify how the proposed power-limiting system is incorporated into the overall electrical configuration, including its interface with the generators and switchgear. This information is necessary for staff to verify the proposed physical limitation on generating capacity and complete its assessment.

DATA REQUEST
DR EFF-4. Please provide the electrical one-line diagram as soon as it becomes available. The one-line

diagram should illustrate the proposed power-limiting system, including applicable power measurement points, protective relays, breaker trip/interlock or block-close functions, and connections between the generator yards and medium- voltage switchgear.

R&L Response

DR EFF-4. The electrical one-line diagram illustrating the proposed power-limiting system is provided as Appendix L Supplement, Section L.1 Electrical One-Line Diagrams (TN 273196). The one-line diagram illustrates the proposed power-limiting system, including the power measurement points, protective relays, breaker trip, interlock, and block-close functions, and the connections between the generator yards and the medium-voltage switchgear.

GREENHOUSE GAS EMISSIONS
Authors: Brewster Birdsall, Rachael Dal Porto

BACKGROUND: Carbon Dioxide (CO2) Emissions from Generators
The SPPE application AQIA, revised June 2026, (TN 271094) includes the applicant's CO2 emission calculations (AQIA Appendix A) that appear to be underestimated. Engine manufacturer specifications (in AQIA Appendix D) and similar projects using these types of engines indicate that full load CO2 emissions would normally be over 2,000 kg/hr (or 4,400 lb/hr), which is about 3 times greater than the rate (1,451 lb/hr) shown in the applicant's emission calculations (TN 271094; PDF pp. 153-154).

DATA REQUEST
DR GHG-4. Please provide additional documentation to support the calculation of project CO2 and other greenhouse gas emissions, such as N2O and CH4, for deriving CO2-equivalent (CO2e) emissions caused by operation of the engine-generators, and if necessary, update the GHG emissions summaries.

R&L Response

DR GHG-4. The calculation of the engine-generator CO2 and other greenhouse gas emissions has been revised. A unit conversion error in the original calculation was identified and corrected, and the emissions are now derived using a CO2-equivalent (CO2e) emission factor of 519.42 grams per horsepower-hour, based on 40 CFR Part 98, Subpart C, comprising CO2 (517.72 g/hp-hr), CH4 (0.021 g/hp-hr), and N2O (0.0042 g/hp-hr). The GHG emissions summaries have been updated accordingly, and the Project's total on-site GHG emissions remain below the EKAPCD significance threshold of 25,000 MT CO2e per year. The supporting documentation for the revised calculation and the updated GHG emissions summaries are provided in the Air Quality Impact Analysis Supplement, Response to DR GHG-4 (TN 273187).

LAND USE
Authors: Negar Vahidi and Tatiana Inouye

BACKGROUND: Project Data and Maps
Per CEQA Guidelines Section 15378(a), a "project" evaluated under CEQA is defined as "…[t]he whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect foreseeable change in the environment."

To evaluate the whole of the action for the proposed RB Inyokern Data Center Project, CEC staff submitted Data Requests DR LAND-1 and DR LAND-2 (TN 270553). DR LAND- 1 requests information on the length of the 34.5 kV gen-tie and the number and types of structures required for the development of the gen-tie. DR LAND-2 requests shapefiles of all proposed project components, including project components that would be constructed by SCE (i.e., subtransmission lines and Inyokern Substation expansion), since the

subtransmission lines and substation expansion would not be needed were it not for the development of the proposed project.

In response to DR LAND-1, the applicant states that the proposed 34.5 kV distribution system "…is underground, no overhead poles, towers, or above-grade structures are required…[and the] total conduit run length for the underground medium-voltage distribution system will be confirmed during final electrical engineering" (TN 269593, page 59). The applicant's response does not provide an estimate of the gen-tie length, nor does the applicant provide a description of the underground components that would be constructed for an underground gen-tie. If the applicant cannot provide estimates of the gen-tie length or a description of the underground construction components, CEC staff will need to make conservative assumptions for these components to support staff's CEQA analysis.

In response to DR LAND-2, the applicant provided preliminary GIS shapefiles to staff, but this geospatial data did not include the following project components: project site boundary, SCE subtransmission line route alignments, Inyokern Substation expansion area, and construction staging and laydown areas. The applicant states that "[t]he precise boundaries and alignments of certain project components – including the SCE- owned subtransmission line final route alignments, Inyokern Substation expansion area, construction staging and laydown areas, and underground medium-voltage distribution conduit routing — have not yet been finalized and will be confirmed during final engineering" (TN 269593, page 59). If finalized information about these project components is currently not available, the applicant should make conservative assumptions about each of those components and provide those assumptions to staff for the CEQA analysis.

For purposes of CEQA, the project evaluated by CEC must include the whole of the action. This includes project components that have not completed final engineering and project components that would be constructed by SCE. To support the land use and planning analysis under CEQA, CEC staff requests the information identified in the data requests below.

DATA REQUESTS
DR LAND-6. Please provide the following details regarding construction of the underground gen-tie:

1. Describe how the underground gen-tie would be constructed. Would it be installed in an underground conduit or duct bank? What construction techniques would be used (i.e., trenching, tunneling) and what equipment would be required for construction?
2. Provide estimates of the length of the gen-tie line, and the width and depth of the underground duct bank or underground conduit.
3. Provide an estimate of the width of the temporary disturbance areas and the permanent disturbance areas along the gen-tie.

R&L Response

DR LAND-6. The gen-tie connects the Point of Interconnection on APN 084-010-48, south of State Route 178, to the data center campus on APNs 084-010-43, -44, and -45, north of State Route 178, within the 30 foot subtransmission easement corridor identified in the Application, a distance of approximately 2,500 linear feet that includes a crossing of State Route 178. The final construction method, alignment, and cross section of the gen-tie will be determined during final electrical engineering. The Applicant provides the following conceptual level information responsive to items (1) through (3).

(1) Construction method. At the conceptual design stage, the gen-tie would be constructed within the easement corridor using standard utility construction methods and equipment. Where installed below grade,

conduit or duct bank would be placed by conventional open trench excavation, consistent with the utility trenching parameters in Table 1-4 of the Main Application (TN 269893), except at the State Route 178 crossing and any other discrete crossings, which may be completed by jack and bore. The specific construction method will be confirmed during final electrical engineering.

(2) Length and cross section. The gen-tie is estimated at approximately 2,500 linear feet within the 30 foot easement corridor, including the crossing of State Route 178. For any below grade installation, Table 1-4 (TN 269893) reflects a typical utility trenching depth of 3 to 5 feet, with a maximum conceptual depth of 8 feet at localized crossings. Final cross section dimensions will be confirmed during final electrical engineering.

(3) Disturbance areas. Temporary construction disturbance would occur within the 30 foot easement corridor identified above, which represents a conservative disturbance envelope for the gen-tie. Consistent with the biological resources analysis (Appendix D Supplement, Section D.1 Revision 2, TN 272820), linear excavation within the corridor is restorable, and disturbed surfaces would be restored following construction. Permanent disturbance would be limited to the constructed gen-tie facilities within the corridor and is anticipated to be minimal.

DR LAND-7. Please provide geospatial data of the following project components:

1. The project site boundary. Please note that the project site boundary must encompass all disturbance areas, access roads, walls and fencing, etc. that are components of project construction and operation.
2. Linear facilities, including the 115-kV subtransmission line routes and the utility fiber optic routes.
3. Inyokern Substation expansion area.
4. Location of construction staging and laydown areas.

R&L Response

DR LAND-7. The Applicant provides geospatial data for the four requested project components as ESRI shapefiles (NAD83 California State Plane Zone 5, EPSG:2229), transmitted to CEC staff via the CEC Kiteworks portal. Consistent with the current conceptual design stage (Section 3.2, Main Application, TN 269893), the data is provided at an approximate level, as follows:

(1) the project site boundary, encompassing the data center facilities, perimeter access roads, and perimeter walls and fencing;
(2) approximate alignments for the 115 kV subtransmission routes and the utility fiber optic routes;
(3) an approximate Inyokern Substation expansion area; and
(4) construction staging and laydown areas, which are located within the project site boundary identified in item (1). No separate offsite staging or laydown areas are proposed.

Consistent with the DR Set 1 responses, the geospatial data for the SCE owned components (the subtransmission routes and the substation expansion) is approximate, and final SCE geometry will be provided upon completion of SCE final engineering under MOS174.

BACKGROUND: Specific Plan Amendment and Conditional Use Permit Application

To support staff's evaluation of project consistency with land use plans, policies, or regulations per CEQA Guidelines Appendix G, CEC staff submitted Data Request DR LAND-5 to request further information on the location of the secondary collector to be eliminated by the proposed Inyokern Specific Plan Amendment, and to request an evaluation of the project's compliance with each of the development standards for a

Medium Industrial (M-2) zoning district (TN 270553).

In response to DR LAND-5, the applicant docketed Appendix N Supplement - Section N.4 (TN 271099) that includes the project-specific applications for an Inyokern Specific Plan Amendment and a Conditional Use Permit. Staff reviewed the project site maps provided in Appendix N.4 (SP-1.1 Site Map Overview, Sheet 2 of 2) and observed that the project site perimeter overlaps with two Kern County road easements, listed as Easement No. 1 and Easement No. 2 on Figure SP-1.1 Site Map Overview. Figure SP-1.1 describes Easement No. 1 as an "easement for public highway purposes, County Road No. 440, also known as Inyokern Road." Figure SP-1.1 describes Easement No. 2. as an "easement for public highway purposes, County Road No. 697, also known as State Highway Route 178." Staff notes that Easement No. 2 is a separate easement from State Route 178 and is located approximately 50 feet north of State Route 178. The proposed project application does not discuss the proposed project's overlap with either of these existing County easements, nor does the application discuss whether an encroachment permit would be required for project construction within each easement.

DATA REQUEST

DR LAND-8. Please provide the following:

1. Describe in detail the project activities proposed within Easement No. 1 and Easement No. 2, as identified in Figure SP-1.1 from Appendix N Supplement - Section N.4 (TN 271099).
2. Explain the type(s) of permit(s) required for these project activities and the agencies that typically have jurisdiction to issue each permit.

R&L Response

DR LAND-8. The Applicant provides the following in response to items (1) and (2).

(1) Project activities within Easement No. 1 and Easement No. 2. The data center facilities and site improvements are located within the project property lines north of State Route 178. Two project features cross Easement No. 2 (County Road No. 697): the project's single primary vehicular access connecting the data center campus to State Route 178, and the gen-tie connecting the Point of Interconnection on APN 084-010-48, south of State Route 178, to the campus on APNs 084-010-43, -44, and -45, north of State Route 178. Both are located on Applicant owned property and cross Easement No. 2 within the public right of way, and would be conducted under the encroachment authorization described in item (2). No project facilities or construction activities are proposed within Easement No. 1 (County Road No. 440, also known as Inyokern Road), which runs along the northern boundary of the site. Secondary emergency access is provided from Brown Road (Section 1.4.1, Main Application, TN 269893).

(2) Permits and jurisdiction. For the Applicant's data center access improvements and the gen-tie crossing of State Route 178, an encroachment permit from the California Department of Transportation (Caltrans), District 9, would be required, and the secondary emergency access from Brown Road would require coordination with the Kern County Public Works Department (Main Application, TN 269893). Any additional encroachment authorization for work within a County road easement would be obtained from the Kern County Public Works Department. Any encroachment or franchise authorization required for the SCE facilities would be obtained by SCE from the agency with jurisdiction over the affected easement or right of way, coordinated with the Applicant under the MOS174 process.

POPULATION AND HOUSING

Authors: Negar Vahidi and Irene Kaufman

BACKGROUND: Project Construction and Operation Workforce

Per CEQA Guidelines Section 15378(a), a "project" evaluated under CEQA is defined as "…[t]he whole of

an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect foreseeable change in the environment."

To evaluate the whole of the action for the proposed RB Inyokern Data Center Project, which includes the SCE 115 kV subtransmission facilities, fiber optic routes, and substation expansion, CEC staff submitted Data Request DR POP-1. In the applicant's response to DR POP-1, the applicant confirmed that the estimated peak construction workforce of approximately 600 workers does not include the SCE construction workforce. The applicant confirmed they will provide SCE construction workforce information once that information becomes available through the MOS174 construction coordination process, prior to the commencement of SCE construction activities. To analyze the whole action during the environmental review process, if the total workforce numbers are currently not available, the applicant can make assumptions for the projected total workforce involved to complete these project components to facilitate staff's CEQA analysis.

DATA REQUESTS

REV 1 DR POP-1. Please provide assumptions for the construction workforce (i.e., maximum project construction workforce) required to complete the construction activities described in Section 2.5 of the application (i.e., constructing the SCE 115 kV subtransmission facilities, fiber optic routes, and substation expansion).

R&L Response

REV 1 DR POP-1. The estimated peak construction workforce of approximately 600 workers identified in the Application pertains to construction of the data center facilities and does not include the workforce required to construct the SCE 115 kV subtransmission facilities, fiber optic routes, and substation expansion described in Section 2.5. Final workforce figures for these SCE facilities will be established by SCE through the MOS174 construction coordination process prior to the commencement of SCE construction activities. To support staff's analysis of the whole of the action in the interim, the Applicant provides the following planning assumption.

The Applicant assumes a maximum construction workforce of approximately 30 workers for the combined SCE facilities, including the 115 kV subtransmission line, the fiber optic installation, and the Inyokern Substation expansion, representing the anticipated peak day total across overlapping crews. This assumption reflects typical crew compositions for SCE subtransmission and substation projects of comparable scope and linear extent. The figure is provided solely as a planning assumption to facilitate staff's CEQA analysis and will be superseded by SCE's confirmed workforce figures once available through the MOS174 coordination process.

REV 1 DR POP-2. Please provide the MOS174 study for CEC staff to review.

R&L Response

REV 1 DR POP-2. The SCE Method of Service Study (MOS174, dated March 30, 2026) is docketed under confidential cover as part of Confidential Appendix M, Section M.3 (Support Documents), for which the Applicant filed an Application for Confidential Designation (TN 269642, docketed April 27, 2026) and which has been designated confidential by the Commission. The Applicant respectfully submits that the MOS174 study, as maintained under confidential cover in Appendix M.3, satisfies the information requested in DR POP-2. The confidential record remains available to authorized persons through the Commission's confidential-records process, and the Applicant will provide reasonable support as needed.

PUBLIC SERVICES

Authors: Negar Vahidi and Irene Kaufman

BACKGROUND: Capacities, Service Standards, and Response Times
California Code of Regulations, title 20, Appendix B (g)(7)(A)(vi) requires the application include the 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. California Code of Regulations, title 20, Appendix B (g)(7)(B)(i) specifically asks for response times to hospitals and for police protection, fire protection, emergency services, parks and recreation facilities, libraries, and other public facilities.

In response to DR PS-1, the applicant docketed copies of emails reaching out to fire protection, law enforcement, and emergency response agencies to request information regarding current service standards and response times. However, their responses to the information requested have not been received.

DATA REQUEST
REV 1 DR PS-1. Please provide the agencies' responses to current service standards and response times of the affected fire protection services, law enforcement, and emergency response agencies.

R&L Response

REV 1 DR PS-1. Written responses from the affected fire protection, law enforcement, and emergency response agencies were received following the outreach docketed in response to DR PS-1, and were previously docketed on July 28, 2026 as Appendix N Supplement, Section N.2 Revision 2 (TN 271673). Specifically, written responses were received from the Kern County Fire Department (fire protection), the Kern County Sheriff's Office (law enforcement), and Kern County Public Health, Emergency Medical Services (emergency medical services). These responses address the affected agencies' current service standards and response times. The Applicant respectfully refers staff to TN 271673 for the complete agency responses and will accommodate promptly should staff require them to be re-transmitted.