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October 28, 2026

AES Corporation
21730 Newland Street
Huntington Beach, California 92646

Data Requests for Huntington Beach Energy Project (12-AFC-02C)

Dear Charlene He,

The California Energy Commission (CEC) staff are asking for the information specified in the enclosed Data Requests which is necessary for the staff analysis of the Huntington Beach Energy Project (HBEP) petition to amend (TN#272355). The proposed project changes include adding four identical 744 brake-horsepower (bhp) low-sulfur petroleum diesel-fueled emergency generators equipped with Environmental Protection Agency (EPA) Tier 4-Final engines.

These Data Requests seek further information in the areas of Air Quality/Public Health, based on the contents of the petition to amend.

To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA (see Cal. Code Regs., tit. 14, §§ 15108, 15109), CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please let me know within 10 days of receipt of this letter.

If you have any questions, please email me at Joseph.Douglas@energy.ca.gov.

Joseph Douglas

Joseph Douglas
Compliance Project Manager

Enclosure: Data Requests

Air Quality/Public Health

Author: Gerry Bemmis

BACKGROUND

The Huntington Beach Energy Project (HBEP) facility owner filed a petition to amend (PTA) with the Energy Commission on September 8, 2026 (TN# 272356). The PTA requests to add four identical 744 brake-horsepower (bhp) low-sulfur petroleum diesel-fueled emergency generators equipped with Environmental Protection Agency (EPA) Tier 4-Final engines at HBEP. Engines 1 and 2 would be located westerly of the existing HBEP combustion turbines (Location A) and Engines 3 and 4 would be located easterly of the existing combustion turbines and near the cooling system (Location B). These four engines would provide emergency power to critical plant equipment in the event of an electrical emergency where grid power is lost. They would only be operated for emergency uses and for periodic maintenance and testing to maintain operational readiness.

The facility already has two existing 275 bhp petroleum diesel-fueled fire pump engines.

In an application dated December 2025, the facility owner submitted a request to the South Coast Air Quality Management District (SCAQMD) to add these four emergency generators to the HBEP site. This request included a payment of $6,199.04 for expedited review by SCAQMD (page 16 of permit application), with beginning of construction estimated to occur in April 2026 and an estimated operating date of August 2026 (SCAQMD application, Form 400-A). The PTA includes the facility owner's permit request to SCAQMD.

Data Requests

1. What factors led to the decision to request addition of these four emergency generators at the HBEP site when they were not included in the original facility design?
2. What is the updated installation schedule now that the April 2026 and August 2026 dates in the permit to SCAQMD have passed?
3. Why are the four new engines planned to be located at two different locations on the HBEP facility site?
4. Is the current design such that each of the six engines would have their own fuel tank? What is the size of each such tank?

5. Would it be beneficial to add a central fuel tank and fuel all six engines from the same tank? Would it be feasible to also fuel any other diesel engines located at the site from this central fuel tank?
6. What is the feasibility of using drop-in-equivalent renewable diesel fuel rather than petroleum diesel fuel in all engines, especially if there was a central fuel tank? Staff notes that the HBEP site is approximately 60 miles from a Kinder Morgan renewable diesel terminal located at Colton, CA (Kinder Morgan - Kinder Morgan Announces Commercial In-Service of Southern and Northern California Renewable Diesel Hub Projects) and approximately 6 miles from a Hart Fueling Service bulk fuel supply located in Costa Mesa (Renewable/HVO Diesel Supplier l Flexible Delivery Schedules). Both locations supply bulk renewable diesel fuel.
7. How would using renewable diesel rather than petroleum diesel affect the cost of these emergency generators?