DOCKETED	
Docket Number:	26-OPT-01
Project Title:	Vaca Dixon Power Center Project
TN #:	273293
Document Title:	Data Request #2 Responses (Response Set #3)
Description:	The Applicant's responses to the Data Request received from the CEC on October 12, 2026.
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Organization:	Rincon Consultants, Inc.
Submitter Role:	Applicant Consultant
Submission Date:	10/30/2026 9:12:51 AM
Docketed Date:	10/30/2026



Vaca Dixon Power Center Project (26-OPT-01)

CEC Data Request Response Set #3

prepared by

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October 2026

RINCON CONSULTANTS

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1 Introduction

On October 12, 2026, Vaca Dixon BESS LLC/Arges BESS LLC (Applicant) received a Data Request from the California Energy Commission (CEC) for the Vaca Dixon Power Center Project (26-OPT-01) in response to the Applicant's application filed on January 14, 2026. The Applicant's first set of responses to the Data Requests received from the CEC were submitted on May 27, 2026, and October 21, 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 #3

Data Request Resources Area	Data Request Number
Alternatives	REV 1 DR ALT-1, REV 1 DR ALT-2
Cultural and Tribal Cultural Resources	REV 1 DR CUL/TRI-1 through REV 1 DR CUL/TRI-2
Greenhouse Gas Emissions (Climate Change)	DR GHG-1 through DR GHG-3
Traffic and Transportation	REV DR TRANS-1
Visual Resources	REV 1 DR VIS-1

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. New or revised graphics, tables, or attachments are provided throughout and as appendices to this document. The responses included in this document are considered complete responses to the corresponding Data Requests.

2 Alternatives

2.1 Data Request REV 1 DR ALT-1

REV 1 DR ALT-1

Provide an updated site component map for the Quinn Road Site Alternative that identifies the following information:

a. Locations of the BESS enclosures;
b. Separation distances between the BESS enclosures;
c. Setback distance of the BESS enclosures from the Vaca Dixon Peaker Plant site;
d. Setback distance of the BESS enclosures from the nearest sensitive receptor property line; and
e. Location of emergency (e.g., fire department) access points.

Response

Updated layout drawings showing the requested information is included as Appendix DR 3-1 Quinn Road Site Updated Layout. Setback distances are identified in the figures included in the Appendix.

2.2 Data Request REV 1 DR ALT-2

REV 1 DR ALT-2

Describe the specific design features that would be required to minimize risks associated with proximity of the Quinn Road Site Alternative to the Vaca Dixon Peaker Plant's facilities, including the peaker plant's aqueous ammonia tank and the natural gas delivery and compression equipment.

Response

The nearest BESS enclosure for the Quinn Road Site Alternative is approximately 132 feet from the existing CalPeak Vaca Dixon Peaker Plant ammonia tank and 89 feet from the natural gas compressor skid. These items are well beyond the fire propagation separating distances denoted in the Large-Scale Fire Test Results (included in the Vaca Dixon BESS Hazard Mitigation Analysis and Arges BESS Hazard Mitigation Analysis). Additional protection would be provided with the installation of a fire wall/security fencing between the BESS enclosure and the CalPeak Vaca Dixon Peaker Plant facilities. Emergency Response Planning documents would incorporate procedures to isolate and protect CalPeak Vaca Dixon Peaker Plant Personnel and Equipment. If off gassing (e.g., carbon monoxide, hydrogen) is detected from the BESS system or the BESS enters thermal runaway, a shutdown of the Vaca Dixon Peaker Plant would commence with the safe, automated isolation and shutdown of the natural gas compressor and ammonia vaporization lines.

3 Cultural and Tribal Cultural Resources

3.1 Data Request REV 1 DR CUL/TRI-1

DR CUL/TRI-1

The application does not address the potential for tribal cultural resources to occur within the project area in the regional summary as required by Appendix B (g) (2) (a). Although CEQA lead agencies are ultimately responsible for determining whether a proposed project would cause impacts to tribal cultural resources (as Section 5.3.1.2 of the application states), this does not preclude attempts by others to assess the potential for tribal cultural resources to occur in a project area. Moreover, CEQA provides sufficient definitions for what kinds of resources may constitute a tribal cultural resource at Public Resources Code, sections 21074(a)(1) and 21074(b)–(c). Please add a discussion of the potential for tribal cultural resources to occur within the project area.

Response

No archaeological resources are located within the Project Area that may also qualify as a tribal cultural resource (TCR) in accordance with CEQA. The Sacred Lands File results received from the Native American Heritage Commission (NAHC) were negative and no TCRs were shared with Rincon because of the outreach completed. AB 52 has not yet been conducted by the lead agency and additional information related to TCRs may be shared as a result of the consultation for the project.

Should archaeological deposits be encountered during Project-related ground-disturbing activities, a TCR may be identified. Thus, potentially significant impacts related to TCRs could result from construction of the Project. Formal AB 52 consultation with interested Tribe(s) may result in different or additional TCR mitigation measures provided by consulting Tribe(s) that are not included in the recommended mitigation section below.

An updated version of Section 5.1 Cultural and Tribal Cultural Resources incorporating this analysis has been resubmitted to the Project docket.

3.2 Data Request REV 1 DR CUL/TRI-2

DR CUL/TRI-2

The confidential technical study states that multiple responses to NAHC outreach were received but does not clarify how those responses were received. Please provide copies of any written responses or summaries of any oral responses as required by Appendix B (g) (2) (D) (i), Appendix B (g) (2) (D) (ii) and Appendix B (g) (2) (D) (iii).

Response

Section 5.5 of the confidential study states that one response was received by Rincon as a result of the outreach to Tribes listed on the NAHC outreach list. The section summarizes the one response.

Clarifying language has been included in Section 5.5 to specify the only response was received via email and that a response was sent from Rincon via email. A copy of the communication has been incorporated into Appendix B of the confidential study.

4 Greenhouse Gas Emissions (Climate Change)

The Project Description states that the 2 uninhabitable, factory assembled control enclosures would be small, conditioned, factory assembled enclosures without water or sewer facilities.

4.1 Data Request DR GHG-1

DR GHG-1

Does the term "conditioned" mean that the enclosures are air conditioned?

Response

Enclosures are equipped with a liquid cooling system and are cooled using refrigerants as identified in the Project Description Update (CEC Docket TN# 273054). Traditional air conditioning will not be used in the battery units. No additional refrigerants beyond those previously disclosed for the Vaca Dixon Power Center Project are proposed.

4.2 Data Request DR GHG-2

DR GHG-2

If so, what refrigerant is used in the air conditioning units? Please demonstrate how the refrigerant would comply with the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses. If not, please propose an alternative refrigerant, and provide annual refrigerant leakage estimates, reported as carbon dioxide equivalent (CO2e) emissions, associated with the newly proposed refrigerant.

The response to DR GHG-7 states that Vaca Dixon BESS will not use SF6.

Response

No additional air-conditioning units, refrigerants, or refrigerant-containing equipment beyond those previously disclosed for the chillers are proposed as part of the project. Accordingly, the project would not require the use or evaluation of any new refrigerants beyond those already identified and disclosed. As stated in the response to DR GHG-7, the project would not utilize sulfur hexafluoride (SF_6).

4.3 Data Request DR GHG-3

DR GHG-3

What insulative gas or system will be used at the Vaca Dixon BESS? Please provide a description, whether there will be GHG leakage emissions, and the quantity of those emissions reported as carbon dioxide equivalent (CO2e) emissions.

Response

The project would interconnect to an existing utility-owned substation that contains existing electrical equipment. Accordingly, the proposed project would not install, operate, or maintain SF_6-insulated equipment and would not result in project-related SF_6 leakage emissions or associated GHG emissions.

5 Traffic and Transportation

5.1 Data Request REV DR TRANS-1

REV DR TRANS-1

In the traffic impact study (TN268168-3, Appendix L) provided with the application, there is reference to 50 construction truck round-trips per day, along with 40 round trips by workers, and 10 round trips by vendors. This seems low relative to construction estimates for other energy projects. Please:

1. Confirm these values are accurate or provide updated values;
2. Specify the duration of the peak construction activities; and
3. Specify the construction schedule relative to the Corby BESS project to identify any overlap.

Response

After reviewing the values presented in the Project application, the Applicant confirmed that increasing the round trips by workers anticipated during construction from 40 round trips to 68 round trips is appropriate. This increase is due to the increased workforce associated with development of the groundwater well as described in the Project Description Update (CEC Docket TN# 273054) as well as through an Applicant review of trips required during completed Projects of similar size. The Project is located on an approximately 10-acre site and there would be no scheduled overlap between construction of the Arges facilities and the Vaca Dixon facilities. Peak workforce would occur during site preparation and grading associated with the Arges facilities and would last approximately 72 days.

The most recent publicly available construction schedule for the Corby BESS project identifies a 14–15-month construction timeline and start date of February 2026. As the Project is still under review, the start date presented is inaccurate. The Vaca Dixon Power Center Project is anticipated to begin construction in November of 2027, which may result in overlap with the Corby BESS project, assuming the project is approved. If overlap occurs, there would be a cumulative construction transportation impact; however, the impact levels would not be expected to exceed the significance thresholds identified in the Project Opt-In Application Traffic and Transportation Section (CEC Docket # 268151).

6 Visual Resources

6.1 Data Request REV 1 DR VIS-1

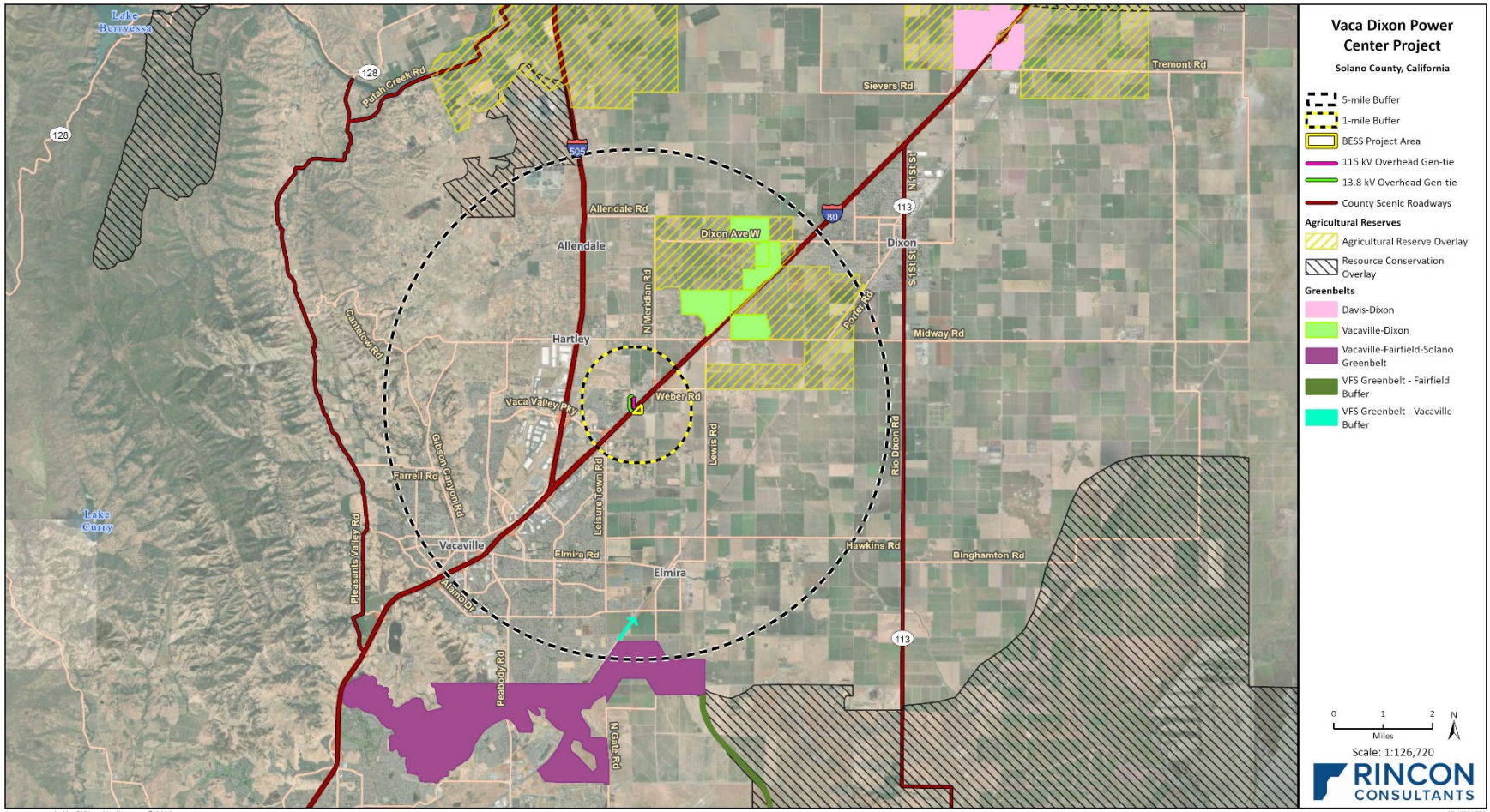
DR VIS-1

As required by CEC Regulations, a map of scenic resources within 5 miles of the project site must be submitted. Although Figure 5.5-1 (TN 270297) depicting scenic resources within 5 miles of the project was provided (TN 270286) in response to Data Request DR VIS-4, and included some Greenbelt areas, the closest greenbelt (Vacaville-Dixon Greenbelt – approximately 2.27 miles to the northeast of the project) was not mapped. Therefore, please add the Vacaville-Dixon Greenbelt to Figure 5.5-1. Please note, the Vacaville-Dixon Greenbelt overlaps with a portion of the Agricultural Reserve Overlay.

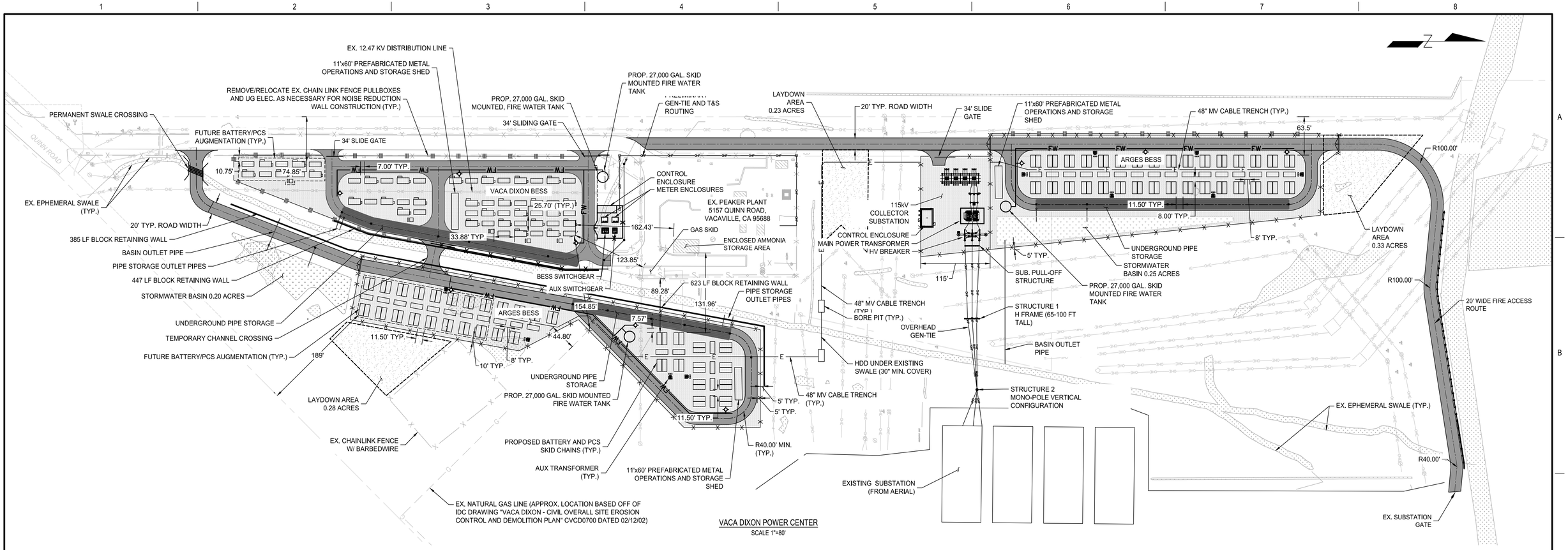
Response

A revised figure, showing the Vacaville-Dixon Greenbelt is included as Figure 1 - Revised Figure 5.5-1 Scenic Highways and Resources within 5 Miles below.

Figure 1 - Revised Figure 5.5-1 Scenic Highways and Resources within 5 Miles



Appendix DR 3-1 Quinn Road Site Alternative Updated Layout



VACA DIXON POWER CENTER
SCALE 1"=80'

EXCAVATION REQUIREMENTS

1. BESS AND SUBSTATION FACILITIES WILL BE BUILT PRIMARILY ON IMPORTED FILL MATERIAL. EXCAVATION FOR BESS FOUNDATIONS A DEPTH OF UP TO 2–FEET.
2. EXCAVATIONS FOR FOUNDATIONS FOR HEAVY EQUIPMENT INSIDE THE SUBSTATION MAY REQUIRE DEEP PILES WITH EXCAVATION TO BEDROCK IN THE FORM OF DRILLING.
3. UNDERGROUND ELECTRIC AND FIRE WATER WILL BE INSTALLED TO AN APPROXIMATE DEPTH OF 3–FEET VIA OPEN CUT TRENCH. UTILITY TRENCHES WILL BE 2'–4' WIDE AND WILL BE BACKFILLED WITH COMPACTED FILL MATERIAL. THE UNDERGROUND ELECTRICAL WILL BE BORED BENEATH THE EXISTING ON SITE DRAINAGE CHANNEL AND HERE THE EXCAVATIONS WILL BE LIMITED TO ONE BORING PIT ON EACH SIDE OF THE CHANNEL. BORING PITS ARE ANTICIPATED TO APPROXIMATELY 8' DEEP AND 10' WIDE BY 20' LONG.
4. UNDERGROUND STORMWATER PONDS WILL REQUIRE EXCAVATED INTO THE IN–SITU SUBGRADE TO AN APPROXIMATE DEPTH OF NO GREATER THAN 5'. EXCAVATIONS WILL BE OPEN CUT WITH SIDE SLOPES LAID BACK OR SHORED PER OSHA REQUIREMENTS.
5. STORM DRAIN PIPE INSTALLATIONS WILL BE VIA OPEN TRENCH CUT TO AN APPROXIMATE DEPTH OF NO GREATER THAN 5' WITH TRENCHES BEING 2'–4' WIDE.
6. EXCAVATION SPOILS MAY BE USED AS TRENCH BACKFILL WHEN TESTED AND APPROVED. UNUSED SPOILS WILL BE HAULED OFF SITE.

GENERAL NOTES

1. COORDINATES LISTED ARE BASED ON NSRS 2011, CALIFORNIA STATE PLANE ZONE II, US SURVEY FOOT.
2. THE BOUNDARY AND BASIS OF BEARING IN THIS SITE PLAN ARE BASED ON THE SURVEY PROVIDED BY MRP CONTAINED WITHIN THE DRAWINGS "Vaca Dixon Topo & Trees – CAD Ver 2023–10–03.dwg" AND "Vaca Dixon ALTA – Preliminary Ver 2023–08–04".
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5. ALL AREAS OF DISTURBANCE OUTSIDE OF BESS PAD AND ACCESS ROADWAY TO BE SEEDED OR OTHERWISE PROVIDED EROSION PROTECTION IN ACCORDANCE WITH PROJECT SWPPP AND EROSION CONTROL PLAN.
6. AFTER STRIPPING TOPSOIL AND GRADING AS NECESSARY, TEMPORARILY STABILIZE CONSTRUCTION LAYDOWN AREA WITH NON WOVEN GEOTEXTILE FABRIC AND 12" OF CALTRANS CLASS 2 AGGREGATE BASE COURSE. REMOVE AGGREGATE AND FABRIC AFTER PROJECT COMPLETION, REDISTRIBUTE TOPSOIL, AND SEED FOR FINAL STABILIZATION.

LEGEND

- EXISTING PROPERTY/LEASE AREA LINE
- PROPOSED LEASE BOUNDARY LINE
- EXISTING CHAINLINK FENCE
- PROPOSED CHAINLINK FENCE
- EXISTING EASEMENT
- EXISTING OVERHEAD ELEC.
- EXISTING POWER POLE
- PROP. UNDERGROUND POWER
- PROP. OVERHEAD POWER
- PROP. NOISE REDUCTION WALL
- PROP. FIRE HYDRANT ASSEMBLY
- PROP. 6" FIRE WATER PIPE
- BESS BATTERY ENERGY STORAGE SYSTEM
- EXISTING DELINEATED WETLAND/STREAM
- 4" STATION FINISH STONE
- PROP. ASPHALT PAVEMENT
- PROP. CONSTRUCTION LAYDOWN AREA

0 80 160 240
1" = 80' FEET

OVERALL PLAN.DWG

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DSGN	ST	07/12/24
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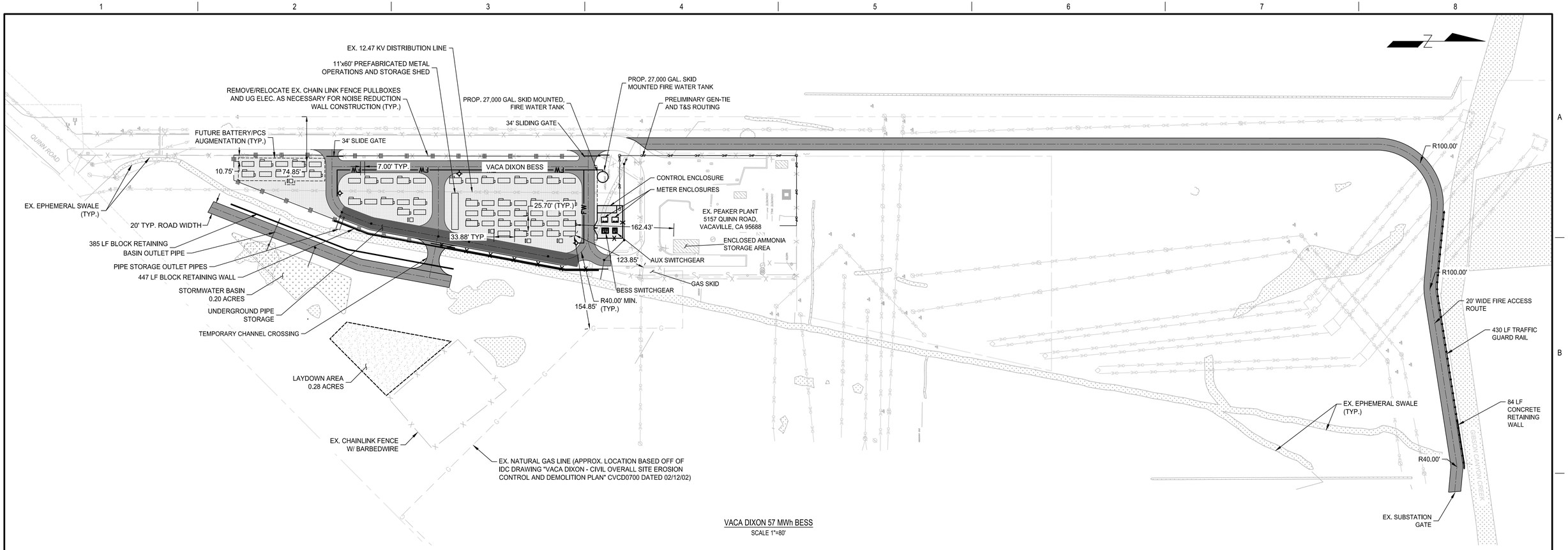
CKD	TH	07/12/24

SCALE: 1"=80'
FOR 22x34 DWG ONLY

POWER ENGINEERS

MIDDLE RIVER POWER
VACA DIXON POWER CENTER
QUINN ROAD ALTERNATE SITE
SITE LAYOUT PLAN

JOB NUMBER 0249671
REV F
DRAWING NUMBER SP100



VACA DIXON 57 MWh BESS
SCALE 1"=80'

EXCAVATION REQUIREMENTS

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- FW — PROP. 6" FIRE WATER PIPE
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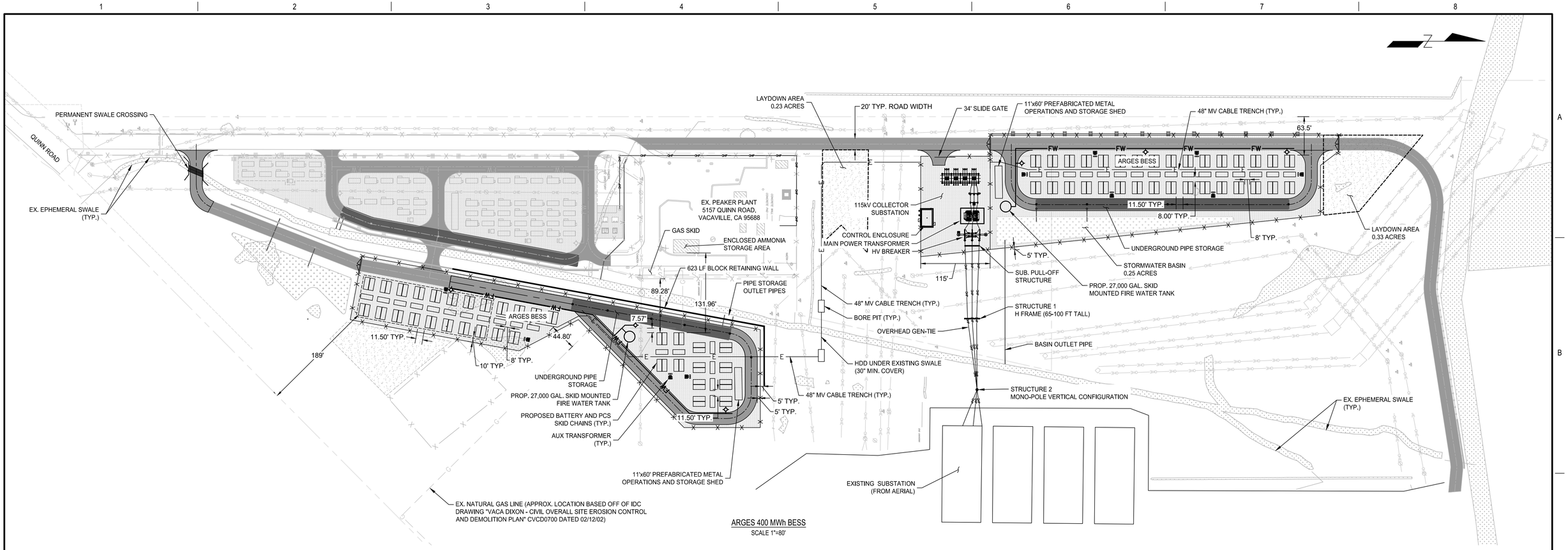
POWER ENGINEERS

MIDDLE RIVER POWER
VACA DIXON POWER CENTER
QUINN ROAD ALTERNATE SITE
VACA DIXON BESS
57 MW, 1-HOUR, 57 MWh

JOB NUMBER 0249671
REV F
DRAWING NUMBER SP101

OVERALL PLAN.DWG



ARGES 400 MWh BESS
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POWER ENGINEERS

MIDDLE RIVER POWER
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100 MW, 4-HOUR, 400 MWh

JOB NUMBER 0249671
REV F
DRAWING NUMBER SP102

OVERALL PLAN.DWG