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Data Request Response #9

Corby Battery Energy Storage System Project (24-OPT-05)

October 2026



Prepared for

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Table of Contents

1.0 INTRODUCTION 1

2.0 GEOLOGIC HAZARDS 1

2.1 Background: Shallow Groundwater 1

2.1.1 Data Request SDR GEO-1 4

2.1.2 Data Request SDR GEO-2 5

2.1.3 Data Request SDR GEO-3 6

2.1.4 Data Request SDR GEO-4 7

2.2 Background: Liquefaction 8

2.2.1 Data Request SDR GEO-5 8

2.2.2 Data Request SDR GEO-6 8

List of Appendices

Appendix 2-A: Supplemental Groundwater Data Analysis
Appendix 2-B: Geotechnical Letter of Memorandum with Supplemental Groundwater Data
Appendix 2-C: BESS Array GeotechNical REport
Appendix 2-D: Project Substation Geotechnical REport
Appendix 2-E: Gen-Tie Line Geotechnical Report
Appendix 2-F: Stormwater Basin HydroCAD Output
Appendix 2-G: Geotechnical Letter of Memorandum with UPdated Liquefaction Evaluation
Appendix 2-H: Site specific Seismic Study

Acronyms and Abbreviations

amsl	above mean sea level
Applicant	North Bay Interconnect, LLC and Corby Energy Storage, LLC
Application	Opt-in Application
BESS	battery energy storage system
bgs	below ground surface
CEC	California Energy Commission
cfs	cubic feet per second
Project	Corby Battery Energy Storage System Project
SDR	Supplemental Data Request

1.0 INTRODUCTION

This Data Request Response #9 to North Bay Interconnect, LLC and Corby Energy Storage, LLC's (Applicant) [1] Opt-in Application (Application) for the Corby Battery Energy Storage System Project (Project) (24-OPT-05) responds to supplement data requests (SDR) that California Energy Commission (CEC) Staff made as a result of their review of public comments on the Staff Assessment, including SDR GEO-1 through -6, which were docketed by Staff on October 19, 2026 (TN# 273156).

Each data request is presented below in its entirety, followed by the Applicant's response to the information requested. If the response requires additional appended material, it is included in numbered appendices at the end of the document.

2.0 GEOLOGIC HAZARDS

2.1 Background: Shallow Groundwater

The 2025 California Building Code, Section 1803.5.4, identifies shallow groundwater as a geologic hazard if (1) groundwater is above or within 5 ft below the elevation of the project's lowest floor, if the floor is below finished grade, or (2) the groundwater depth will affect the design and construction of the buildings and structures (CBC 2025).

The project's 2024 preliminary site-specific geotechnical investigation (geotechnical investigation) observed shallow groundwater at depths of 7.5 ft to 15 ft below ground surface (bgs) in September 2023. The geotechnical investigation also included one-time observations of groundwater depths from 24 publicly available well logs. These groundwater-depth data are not available as groundwater elevations, measured as ft above mean sea level (amsl) (TT 2024e). While one-time observations of past groundwater depths are helpful, time-series groundwater elevation data are more reliable for evaluating groundwater elevation trends at the project site.

A public comment on the Staff Assessment noted that CEC staff did not evaluate groundwater elevation trends at the project site for potential impacts related to shallow groundwater. Specifically, the comment questioned why CEC staff did not investigate if groundwater elevations higher than those observed during the geotechnical investigation may occur at the project site (Gellar 2026). CEC staff conservatively used the shallowest groundwater depth observed for the project site in the most recent geotechnical investigation because that was most consequential site-specific information available. A continuous, time-series, site-specific groundwater elevation record, would be more helpful to evaluate groundwater elevation trends at the project site.

Groundwater depth information alone is not an accurate indicator of groundwater elevations for the purpose of comparison at different locations. Other factors, including ground surface elevation, aquifer geology, natural and artificial recharge rates, and groundwater pumping rates, should also be considered when using groundwater-depth data to interpret groundwater elevations. The project site

[1] North Bay Interconnect, LLC and Corby Energy Storage, LLC are both wholly-owned subsidiaries of NextEra Energy Resources. North Bay Interconnect, LLC will own and operate the interconnection facilities for the Project; and Corby Energy Storage, LLC will own and operate the BESS components of the Project.

is an area of the Solano Subbasin where the ground surface elevation slopes downward from west to east.

The Solano Subbasin contains two primary aquifer zones: 1) the Alluvial Aquifer and Upper Tehama Zone and 2) the Basal Tehama Zone. The Alluvial Aquifer and Upper Tehama Zone are a hydraulically connected sequence of sedimentary deposits that include surficial Quaternary alluvium, the Montezuma Formation, and the Upper Tehama Formation. Groundwater in the Alluvial Aquifer and Upper Tehama Zone is unconfined (Solano Collaborative 2026).

An aquitard, the Middle Zone of the Tehama Formation, limits vertical groundwater movement between the Upper Tehama Zone and the Basal Tehama Zone. The Basal Tehama Zone is a confined aquifer (Solano Collaborative 2026).

A complex and interconnected set of natural and artificial factors impact groundwater elevations across time and space. CEC staff reviewed seasonal groundwater contour maps and time-series groundwater elevation data presented in Annual Reports prepared for the Solano Subbasin Groundwater Sustainability Agency Collaborative and Solano County Water Agency.

The CEC staff reviewed groundwater elevation contour maps for the Alluvial Aquifer and Upper Tehama Zone. In the Solano Subbasin Annual Report for Water Year (WY) 2025, Appendix B presents groundwater elevation contour maps for the springs and falls of 2015 through 2022 (Solano Collaborative 2026). The Solano Subbasin Annual Report for WYs 2023 and 2024, Figures 3-2 and 3-4, present groundwater elevation contour maps for the springs and falls of 2023 and 2024, respectively (Solano Collaborative 2024, 2025). The Solano Subbasin Annual Report, Figures 3-2 and 3-3, present groundwater elevation contour maps for Spring 2025 and Fall 2025, respectively (Solano Collaborative 2026).

From 2015 to 2025, groundwater in the Alluvial Aquifer and Upper Tehama Zone consistently flowed downslope, from west to east, with one exception (Solano Collaborative 2024, 2025, 2026). In Fall 2023, groundwater may have flowed east to west towards a temporary cone of depression under Vacaville, CA (Solano Collaborative 2024).

The Solano Subbasin Annual Report for WY 2025, Figure 3-6b, presents groundwater hydrographs at monitoring wells in the project site's area. The hydrographs show multiple decades of time-series groundwater elevation and groundwater-depth data. Groundwater elevations decrease from west to east. Measured groundwater-depths also decrease. In the project's area, groundwater-depths become shallower even as groundwater elevations decrease (Solano Collaborative 2026).

The project site is an area where the ground surface slopes in the same direction as groundwater flow. CEC staff interpret that the primary reason that groundwater-depths decrease from west to east is that ground surface elevations decrease at a faster rate than groundwater elevations. CEC staff request continuous time-series groundwater data for the project site to better understand groundwater-depth and groundwater elevation trends at the project site.

CEC staff interpret that the geotechnical investigation understood the need for timeseries groundwater-depth and groundwater elevation data at the project site. The geotechnical investigation, Section 3.1.1 and Figure 12, stated that a piezometer was installed at the project site in

boring B-9 (TT 2024e). CEC staff presume the piezometer's purpose was to measure groundwater depths and elevations at the project site to inform final engineering and grading decisions, including for subsurface components. A summary of one-month of time-series groundwater-depth data was provided in the geotechnical investigation, Appendix A, Table A3 (TT 2024e).

The geotechnical investigation concluded that shallow groundwater may impact the project's subsurface components. For example, the geotechnical investigation identified a design groundwater-depth of 7 ft bgs for shallow foundation systems that would support light loads (TT 2024e). Based on information presented in the geotechnical investigation and the following new evaluation of regional time-series groundwater elevation data, CEC staff conservatively interprets that a design groundwater-depth of 7 ft bgs might be too deep.

The Solano Subbasin Annual Report for WY 2025, Figure 3-6b presents time-series groundwater elevation data at three monitoring wells that are within two miles of the project (Solano Collaborative 2026). CEC staff evaluated this information:

- Monitoring well ID no. MW-15-188ft is less than two miles west of the project. At this well, groundwater is usually flowing east toward the project site.
    - During approximately 2000 to 2025, groundwater elevations ranged from about 64 ft to 82 ft amsl. These groundwater elevations correspond to groundwater-depths of about 31 ft to 13 ft bgs, respectively.
- Monitoring well ID no. 06N01W01B001M is less than two miles northwest of the project. At this well, groundwater is usually flowing east toward the project site.
    - From approximately 1960 to 2008, groundwater elevations ranged from 17 ft to 80 ft amsl. These elevations correspond to groundwater-depths of about 68 ft to 5 ft bgs.
    - During approximately 2010 to 2025, groundwater elevations ranged from 53 ft to 65 ft amsl. These elevations correspond to groundwater-depths 32 ft to 20 ft bgs.
- Monitoring well ID. no. 06N01E05A001M is less than two miles northeast of the project. At this well, groundwater is usually flowing east, away from the project site.
    - During approximately 1975 to 2025, groundwater elevations ranged from 50 ft to 63 ft amsl. These elevations correspond to groundwater-depths of about 15 ft to 2 ft bgs.

Upon review of these Solano Subbasin groundwater elevation contour maps and timeseries groundwater data, CEC staff interpret two important trends related to shallow groundwater at the project site. First, groundwater elevations in the vicinity of the project site are usually higher in the spring than in the fall. The geotechnical investigation measured groundwater depths in September 2023. Second, at the project location, groundwater elevations were at, or above, 70 ft amsl in at least Spring 2015, Spring and Fall 2016, Spring and Fall 2017, Spring and Fall 2018, Spring 2019, Spring 2020, Spring 2023, Spring 2024, and Spring 2025. In the springs of 2019, 2020, 2023 and 2024, groundwater elevations under the project site were about 75 ft amsl (Solano Collaborative 2024, 2025, 2026).

CEC staff note the following limitations and discrepancy from the Solano Subbasin Annual Reports. First, the duration of time depicted in the groundwater elevation contour maps is unclear. For example, it is not clear to CEC staff if the maps represent groundwater elevations on a particular date or month within a season, or if the groundwater elevation contours shown represent an average value for a season. Second, CEC staff are unable to interpret the number of days per year that groundwater depths at the project site were shallower than 7.5 ft bgs. Third, the timeseries groundwater elevation data at selected monitoring wells do not always depict consistent groundwater elevations when compared to the seasonal groundwater elevation contour maps. Despite this discrepancy, the available data, and their limitations, support a conservative interpretation that groundwater depths shallower than 7.5 ft bgs may occur at the project site.

Project Description Update #2, Part 1, the project's most recent grading and site plan, shows that the ground surface elevation of the BESS and substation components would be 75 ft to 78 ft amsl. The bottom of the stormwater retention ponds would be 70 ft amsl. The top of the stormwater retention ponds would be 75 ft amsl (TT 2026a).

Based upon the information described in this supplemental data request, CEC staff conservatively conclude that high groundwater elevations, 70 ft to 75 ft amsl may occur at the project site during project construction and operation. These groundwater elevations would be within 2 to 3 ft of the ground surface elevations of the BESS and substation components. These groundwater elevations would be up to 5 ft above the bottom of the stormwater retention ponds.

The geotechnical investigation's proposed mitigation for addressing potential impacts from shallow groundwater impacts to subsurface project components provides some helpful information (TT 2024e). For example:

- The geotechnical investigation recommended that the surficial 2-ft of expansive soils be replaced with a layer of similar thickness of engineered fill. The engineered fill would underlie the foundations for the BESS and substation (TT 2024e).
- For the BESS, the geotechnical investigation recommended steel pile foundations, with helical pile and ground screw foundations as an alternative (TT 2024e).
- For shallow foundation systems that would support lightly loaded structures, such as inverter/transformer skids, the geotechnical investigation recommended a design groundwater-depth of 7 ft bgs (TT 2024e).

However, CEC staff needs additional information on the proposed design of subsurface project components to evaluate how potential impacts from shallow groundwater would be mitigated.

2.1.1 Data Request SDR GEO-1

SDR GEO-1: Please provide the full record of site-specific time-series groundwater depth and groundwater elevation data collected at the project site. Please provide processed (QA'd and QC'd) data in a tabulated format in a Microsoft Excel compatible spreadsheet. Please provide hydrographs depicting the data. Please explain how the data supports the project's current site and grading plan.

Response: As reported in the draft geotechnical investigation filed as Appendix 2-E of the original Application (TN# 259882), onsite groundwater depth measurements were collected in September and October 2023, during the Project geotechnical investigation; additional timeseries measurements were not collected. Therefore, in response to this SDR, the Applicant performed additional review of available groundwater monitoring well elevation data to provide information on seasonal and peak groundwater elevations at the Project site; this analysis is provided herein as Appendix 2-A.

As requested by CEC, a full record of site-specific time-series groundwater depth and groundwater elevation data collected from wells located at and closest to the project site is provided in Appendix 2-A. We believe that our study results are more representative than the conclusions provided in the SDR background information (included above) because our study utilizes data that are more relevant and specific to project site; for example, our study utilizes more data from wells proximal to the site, monitoring wells rather than production wells, shallow wells that are relevant for the subgrade structural design purpose rather than deeper wells, and wells with sufficient data frequency and date ranges.

The analysis focuses on shallow groundwater wells completed within the uppermost hydrogeological unit that are closest to the Project site to yield the most representative data for the analysis. Groundwater elevations in wells that include screening in deeper layers can be influenced by conditions within the deeper aquifer layers. Additionally, only wells with sufficient data measurement frequency for the date ranges (2011 through 2026) were evaluated. Appendix 2-A includes a detailed list of wells within the study area that were considered.

The results of this evaluation indicate that the estimated highest groundwater surface elevation at the Project site during wet season peak levels over the past 15 years is approximately 72 feet above mean sea level, approximately 5 feet below ground surface. This is based on studying peak elevation events using daily time series data available for California Department of Water Resources monitoring well MW-1C, located 9.7 miles east of the Project site. While this well is located at a greater distance than the wells studied to develop the peak elevation estimate, it is representative of peak groundwater patterns in the Project area. The results of the analysis indicate that the duration of a peak event (defined as the groundwater elevations within two feet of the maximum peak level, or between 70 and 72 feet above mean sea level at the Project site) is expected to range from 10 to 67 days depending on variations in wet season precipitation patterns.

The results of this analysis were used to address the Project design questions in the subsequent SDR responses.

2.1.2 Data Request SDR GEO-2

SDR GEO-2: Based on evaluation of regional and site-specific time-series groundwater depth and groundwater elevation data, and potential shallow groundwater hazards, is the applicant considering modifications to the project's site and grading plan? If yes, please provide the project's new site and grading plan.

Response: Based on the analysis presented in response to SDR GEO-1, estimated highest groundwater surface elevation at the Project site during wet season peak events is approximately 72

feet above mean sea level, or 5 feet below ground surface. RRC Power and Energy, LLC conducted a foundation design recommendation verification review based on the additional peak groundwater elevations data (see Appendix 2-B). This review confirmed that shallow and deep foundation design recommendations (for BESS array, Project substation, and gen-tie line) included within previously issued geotechnical reports remain valid for design purposes. In addition to the verification review letter, the following updated geotechnical investigation reports are included to facilitate Staff's comprehensive review:

- Geotechnical Report, Corby BESS Project, dated June 10, 2026 (Appendix 2-C)
- Geotechnical Report, Corby BESS Project – Substation, dated July 31, 2026 (Appendix 2-D)
- Geotechnical Report Corby BESS Project – Transmission Line, dated August 17, 2026 (Appendix 2-E)

Burns & McDonnell has evaluated the site elevations and grading design based on the estimated maximum peak groundwater elevation of 72 feet above mean sea level and does not recommend updates to the grading design. BESS equipment will be structurally supported by galvanized steel piles. The Project is obtaining a corrosion engineering consultant to evaluate soil, groundwater, and atmospheric corrosion exposure and provide design recommendations for foundations, grounding, buried metallic infrastructure, and exposed steel system.

The north and south stormwater ponds on the site are excavated to an approximate depth of 5-feet below existing grade and have a bottom elevation of 71 and 70 feet respectively. Both basins will experience standing water after rain events due to poor infiltration rates due to shallow groundwater. In extreme rainfall seasons, the basins could see standing water directly resulting from shallow groundwater. Burns & McDonnell evaluated the extreme case of having a groundwater elevation of 72-feet and how it would impact the drainage models. The hydrology models (HydroCAD) were rerun for the 100-yr 24-hr storm assuming a standing water elevation of 72 feet (max peak) in the ponds. The results show that the 100-yr peak flow rates are attenuated from a pre-condition flow rate of 73.4 cubic feet per second (cfs) to a post-conditions flow rate of 71.4 cfs without changing the site grading or pond outfall elevations (see Appendix 2-F).

2.1.3 Data Request SDR GEO-3

SDR GEO-3: Please describe how potential impacts from shallow groundwater on construction of subsurface project components, including excavations, grading, and foundations would be mitigated. The evaluation should include the entire project, including the main project site and linear components, such as the gen-tie route and utility lines.

Response: Shallow groundwater mitigation would be needed for construction in areas where excavation is below the groundwater level. This would likely be encountered if pond or trench excavation were to occur during seasonal high extremes. If groundwater was encountered during construction, mitigation would entail using a sump pump with attached filter bag to pump water out of the excavated areas and into the drainage ditch adjacent to Byrnes Rd. The dewatering requirements outlined in the National Pollutant Discharge Elimination System General Permit for

Storm Water Discharges Associated with Construction and Land Disturbance Activities[2] (State Water Resources Control Board Order No. 2022-0057-DWQ, General Permit No. CAS000002, as amended; Construction General Permit) will be adhered to, which will be addressed in detail in the Project's Construction Storm Water Pollution Prevention Plan. Construction dewatering discharge is an allowable non-storm water discharge under the Construction General Permit if it is unable to be eliminated, has appropriate BMPs for sediment control, and does not contain pollutants that would create an exceedance of water quality standards in receiving waters. Additionally, mitigation for excavating soils in a saturated condition would entail spreading them out to be dried prior to placement as fill material. These operations would be handled as part of construction sequencing with no major design implications.

For the gen-tie line, Burns & McDonnell does not anticipate changes to the gen-tie transmission line design resulting from the revised groundwater elevation based on the supplemental geotechnical information provided herein. However, the revised maximum groundwater elevation will be incorporated into the final transmission pole foundation designs. The construction specifications account for installation in high-groundwater conditions, including dewatering, excavation stabilization, and concrete placement through slurry or underwater, where applicable. Contractor-proposed installation procedures will be reviewed for conformance with the design requirements and construction specifications.

2.1.4 Data Request SDR GEO-4

SDR GEO-4: Please describe how potential impacts from shallow groundwater on project operation would be mitigated. For example, explain how the design, grading, and construction of subsurface project components, including excavations, grading, and foundations, would mitigate potential impacts from shallow groundwater that may occur during project operation. The evaluation should include the entire project, including the main project site and linear components, such as the gen-tie route and utility lines.

Response: Once the project is constructed, shallow groundwater will not need to be mitigated for any of the BESS or substation equipment. The basins are designed as wet ponds as stormwater will be slow to infiltrate due to shallow groundwater. Standing water within the basins may occur after rain events. Vegetation for the ponds will be designed to grow in saturated and wet conditions.

For the gen-tie line, Burns & McDonnell does not anticipate changes to the gen-tie transmission line design resulting from the revised groundwater elevation based on the supplemental geotechnical information provided herein. Groundwater conditions are addressed through the design of the transmission pole foundations and subsurface components for the underground portion of the line as well as the specified construction requirements. These requirements include dewatering, temporary casing or slurry to maintain excavation stability, and concrete placement through slurry or underwater, where applicable.

[2] NPDES 2022 Construction Stormwater General Permit | California State Water Resources Control Board

2.2 Background: Liquefaction

The geotechnical investigation observed that the soils and sediments that underlie the project site are mostly fine-grained clays and silts, with some sand layers. Clay soils and sediments were observed at depths of 0.5 ft bgs to 9 ft bgs. The geotechnical investigation, Section 4.5 and Table 4.5.1 concluded that liquefaction risk at the main project site is low (TT 2024e). The project application conservatively concluded that liquefaction risk at the main project site is low to moderate (TT 2024c). CEC staff agrees with the application's conservative conclusion.

The geotechnical investigation proposed mitigation for addressing potential impacts from liquefaction. However, it is not clear to CEC staff if the proposed mitigation considered the liquefaction potential of soils and sediments at the project site that are shallower than the shallowest groundwater-depths observed during the geotechnical investigation, 7.5 ft bgs.

2.2.1 Data Request SDR GEO-5

SDR GEO-5: Please explain if the geotechnical investigation evaluated the liquefaction potential of soils and sediments at the project site that are shallower than 7.5 ft bgs.

Response: Based on the analysis presented in response to SDR GEO-1, estimated highest groundwater surface elevation at the Project site during wet season peak events is approximately 72 feet above mean sea level, or 5 feet below ground surface. A supplemental liquification evaluation is provided in Appendix 2-G. The results of this analysis are consistent with the previous Site-Specific Seismic Study & Seismic Hazard Analysis, prepared by RRC Power and Energy, LLC dated May 29, 2026, which was based on a groundwater depth of 7 feet below ground surface. This previous analysis is also provided in Appendix 2-H.

2.2.2 Data Request SDR GEO-6

SDR GEO-6: Based on evaluation of regional and site-specific time-series groundwater elevation data, and potential liquefaction hazards, is the applicant considering modifications to the project's site and grading plan? If yes, please provide the project's new site and grading plan.

Response: Please see the response to SDR GEO-5. There are no grading modifications needed based on potential liquefaction hazards.

APPENDIX 2-A: SUPPLEMENTAL GROUNDWATER DATA ANALYSIS

TETRA TECH

Memo

To: NextEra Energy Resources, LLC

From: Don Lee, PG, CHG (Tetra Tech)

Date: October 28, 2026

Subject: Supplemental Groundwater Data Analysis Results
Corby BESS Project
Solano County, California

1.0 INTRODUCTION

The purpose of this technical memorandum is to present the results of a supplemental groundwater data analysis in response to the California Energy Commission's (CEC) data request SDR GEO-1 for the Corby Battery Energy Storage System (BESS) Project (Project):

> ***SDR GEO-1:*** *Please provide the full record of site-specific time-series groundwater depth and groundwater elevation data collected at the project site. Please provide processed (QA'd and QC'd) data in a tabulated format in a Microsoft Excel compatible spreadsheet. Please provide hydrographs depicting the data. Please explain how the data supports the project's current site and grading plan.*

Onsite piezometer groundwater elevation data were collected in September and October 2023 only. Therefore, Tetra Tech prepared this supplemental groundwater data analysis to address the hydrogeological component of SDR GEO-1. Engineering components related to site grading and development plan are addressed by others.

2.0 GROUNDWATER DATA

Tetra Tech obtained historical groundwater level data from the past 15 years (2011 to 2026) from relatively shallow monitoring wells and select water production wells located closest to the Project site (generally within 2 miles) from publicly available sources including California Department of Water Resources SGMA Data Viewer database (DWR, 2026) and California State Water Resources Control Board GeoTracker database (SWRCB, 2026). Table 1 lists wells in the study area that were reviewed. Only the shallow wells, completed within the uppermost hydrogeological unit, Quaternary Alluvium, were selected to reduce other groundwater influences and because they are more relevant for geotechnical subgrade structural design needs. Additionally, only wells with sufficient data frequency and date ranges were selected. Figure 1 shows well locations.

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Table 1. Wells in the Study Area

Site Code	State Well Number/Well Name	Data Source	Data Utilized?	Rationale
383782N1219413W001	MW-14	SGMA	No	Well depth of 1655 feet is too deep.
384056N1218600W001	07N01E33R001M	SGMA	No	Data only to 2004.
384033N1219331W001	CofV MW-98B	SGMA	No	Well depth of 1,819 feet is too deep.
384060N1219352W001	07N01W35R001M	SGMA	No	Data only to 1994.
384163N1219023W002	CofV DeMello MW-95ft	SGMA	Yes	Semiannual data to 2022.
384198N1218912W001	07N01E29P001M	SGMA	No	Well depth of 450 feet is too deep.
384165N1218599W001	07N01E33A001M	SGMA	No	Well depth of 1,030 feet is too deep.
383791N1218784W001	06N01E08J002M	SGMA	No	Data only to 2012.
383598N1219161W001	06N01W13R001M	SGMA	No	Data only to 2012.
383754N1219230W001	06N01W12Q001M	SGMA	No	Data only to 1999.
383570N1219432W001	06N01W23C001M	SGMA	No	Data only to 1988.
383662N1218963W001	06N01E17M001M	SGMA	Yes	Industrial well. Well depth of 120 feet. Monthly data from 2019 to 2026.
383900N1219348W003	MW-15	SGMA	Yes	Monitoring well. Well depth of 188 feet, semiannual data 2011 to 2026.
384015N1218800W001	06N01E05A001M	SGMA	Yes	Residential. Well depth of 101 feet, monthly data 2019 to 2026.
383996N1219208W001	06N01W01B001M	SGMA	Yes	Well depth of 150 feet. Monthly data 1960s to 2007, then semiannually 2009 to 2012.
384018N1219142W001	06N01E06D001M	SGMA	Yes	Well depth of 90 feet. Data semiannually 1940s to 2012.
NA	07N02E35D001M MW-1C	SGMA	Yes	Well screen depth of 28 to 38 feet. Daily data to 2026.
NA	MW-22A	GeoTracker	Yes	Monitoring well screen depth of 5 to 19 feet. Quarterly data to 2026.
NA	MW-23A	GeoTracker	Yes	Monitoring well screen depth of 6 to 20 feet. Quarterly data to 2026.
NA	LF-4	GeoTracker	Yes	Monitoring well screen depth of 5 to 20 feet. Quarterly data to 2026.
NA	MW-5	GeoTracker	Yes	Monitoring well screen depth of 5 to 25 feet. Semiannual data to 2026.

NA – not available
SGMA – SGMA Data Viewer

3.0 DATA ANALYSIS AND RESULTS

Historical groundwater level data from monitoring wells and selected water supply wells are plotted on hydrographs referenced to mean sea level and depth below ground surface in Figures 2 and 3, respectively. Hydrographs of other wells that may provide additional data are provided in Attachment A. Groundwater level data files for wells that were analyzed for this study will be submitted separately in Excel format. A list of the Excel data files is provided in Attachment B. Key findings are summarized below:

- The Corby BESS site piezometer (B-9) groundwater level measurements from September and October 2023 (two data points) track very closely with the groundwater levels measured at nearby wells. The

groundwater level change over time (i.e., the slope between the two data points) is nearly parallel to that of the nearby wells, demonstrating a strong correlation.

- High groundwater levels in wells occur typically in the spring. The highest groundwater levels that occurred at each well in the study area during the past 15 years are shown in Figures 2 and 3.

The high groundwater level for the Corby BESS site was evaluated using the highest groundwater level data from the nearby monitoring wells, interpolating between the known data points plotted on a groundwater surface profile across the study area.

- A baseline groundwater profile of contemporaneous groundwater level measurements from three locations: upgradient (MW-5), Projectsite (B-9), and downgradient (MW-22A, MW-23A, and LF-4 cluster) collected during the period of October to November 2023 was generated on a hydrogeological cross-section (Figure 4). As shown on the cross-section Figure 4, this groundwater profile has a nearly straight-line relationship between the groundwater elevations at the three locations.
- Figure 4 also shows the highest groundwater surface levels measured during the past 15 years, which occurred on 3/9/2011, 2/26/2019, 3/16/2023, 3/18/2024, 2/18/2025 (the five highest peaks on hydrographs). Based on the highest of the five highest groundwater surface levels, the highest groundwater surface level for the Corby BESS site was estimated using interpolation, predicting the groundwater level between the existing known data points, bounded by known values on both sides. The groundwater surface profiling results indicated the estimated highest groundwater surface elevation at the subject site is approximately 72 feet above mean sea level, approximately 5 feet below ground surface.
- Groundwater elevation contour maps of the October to November 2023 baseline and the March 2024 high groundwater event are shown as Figures 5 and 6, respectively. The groundwater gradient pattern in the study area during both the baseline and the March 2024 high groundwater event are similar, which indicates that the groundwater flow patterns have not been altered during high groundwater events and that the interpolation of groundwater levels is a valid approach to estimate groundwater level at the Project site.

Tetra Tech determined the duration of each high groundwater event using daily groundwater measurements from California Department of Water Resources monitoring well MW-1C (see hydrographs). This monitoring well is located approximately 9.7 miles east of the Project site, as such groundwater level fluctuations correspond to the wells near the subject site with a time lag as expected (see hydrographs). The high data frequency provides an accurate estimate of groundwater level change over time. The purpose of this data is not the magnitude of groundwater levels, which are better provided by the data from the other wells located closer to the Project site. The high groundwater events and the durations are shown in Table 2 below.

Table 2. High Groundwater Peak Events (2011–2026)

High Groundwater Event Peak Date	Estimated Dwell Time of Groundwater at 70 to 72 Feet Above Mean Sea Level Interval at Corby BESS Project Site (Days)
3/9/2011	23
2/26/2019	26
3/16/2023	10
3/18/2024	45
2/18/2025	67

The duration of each peak ranges from 10 to 67 days for 2 feet of vertical groundwater displacement to and from the peak. Therefore, the estimated duration of 2 feet of soil saturation from 70 to 72 feet above mean sea level at the Project site during a hypothetical high groundwater event is expected to range from 10 to 67 days depending on variations in precipitation patterns, based on historical data.

4.0 REFERENCES

California Department of Water Resources (DWR). 2026. SGMA Data Viewer. Available online at: https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevels (accessed October 2026).

California State Water Resources Control Board (SWRCB). 2026. GeoTracker. Available online at: https://geotracker.waterboards.ca.gov/ (accessed October 2026).

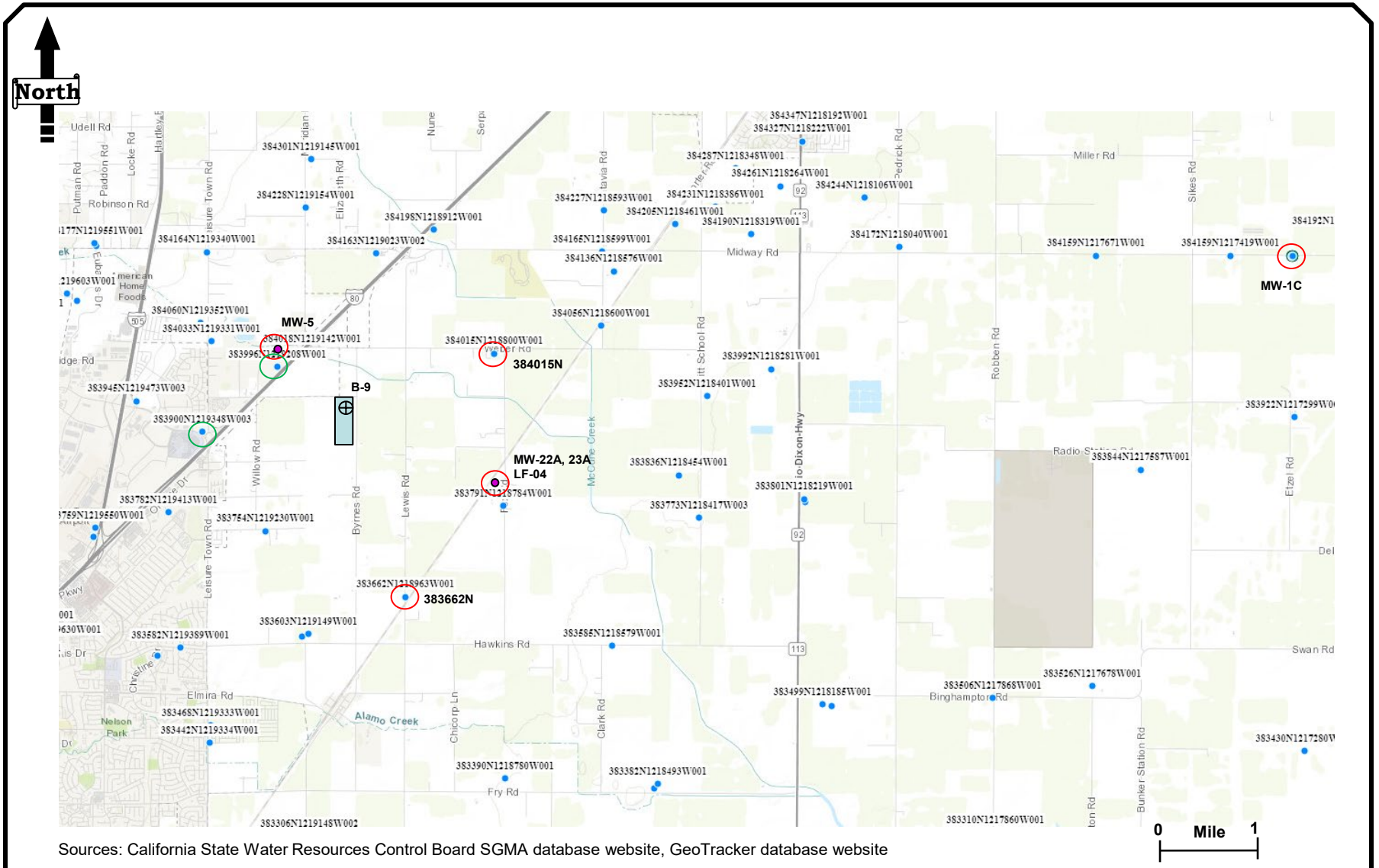
FIGURES

Figure 1 – Water Well Locations
Figure 2 – Hydrographs (2011 – 2026) referenced to elevation mean sea level
Figure 3 – Hydrographs (2011 – 2026) referenced to ground surface
Figure 4 – Cross-Section Plot – Groundwater Levels (October – November 2023)
Figure 5 – Groundwater Elevation Contour Map – October–November 2023
Figure 6 – Groundwater Elevation Contour Map – March 2024 Peak Event

ATTACHMENTS

Attachment A – Hydrographs – Additional Wells 06N01W01B001M and MW-15
Attachment B – Groundwater level data files in Excel format

FIGURES



Sources: California State Water Resources Control Board SGMA database website, GeoTracker database website

- Water Well / Monitoring Well Locations (SGMA database)
- Monitoring Well Locations (GeoTracker databse)
- Hydrographs Provided on Figures 2 and 3
- Hydrographs Provided in Appendix A

TITLE:	**Water Well Locations**
LOCATION:	**Solano County, CA**
TETRA TECH	CK BY: / DRAFTED BY: / PROJ: / DATE:
FIGURE:	**1**

Figure 2
Hydrographs (2011 - 2026)
Groundwater Levels In the Vicinity, Corby BESS, Solano County, CA

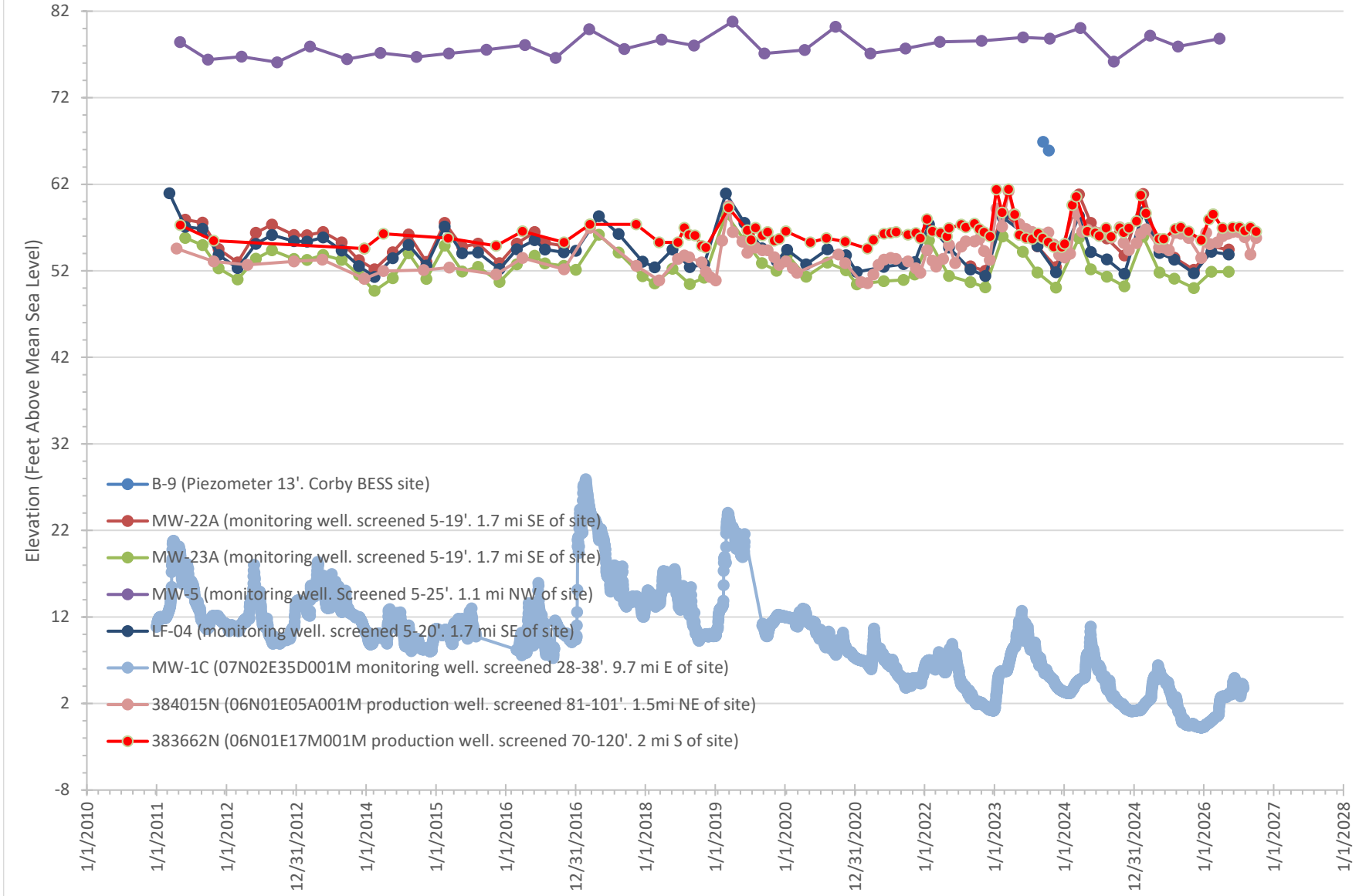


Figure 3
Hydrographs (2011 - 2026)
Groundwater Levels In the Vicinity, Corby BESS, Solano County, CA

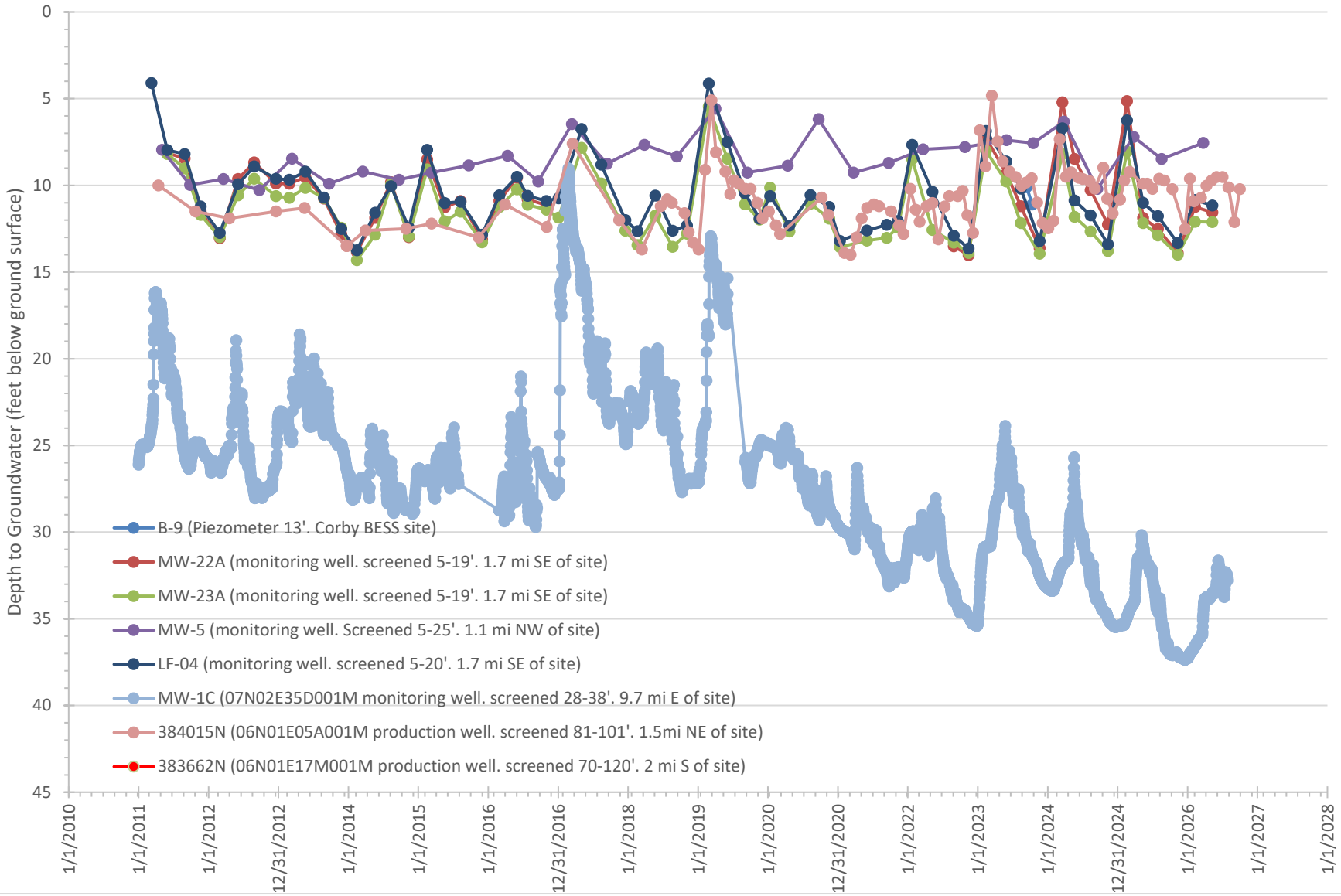
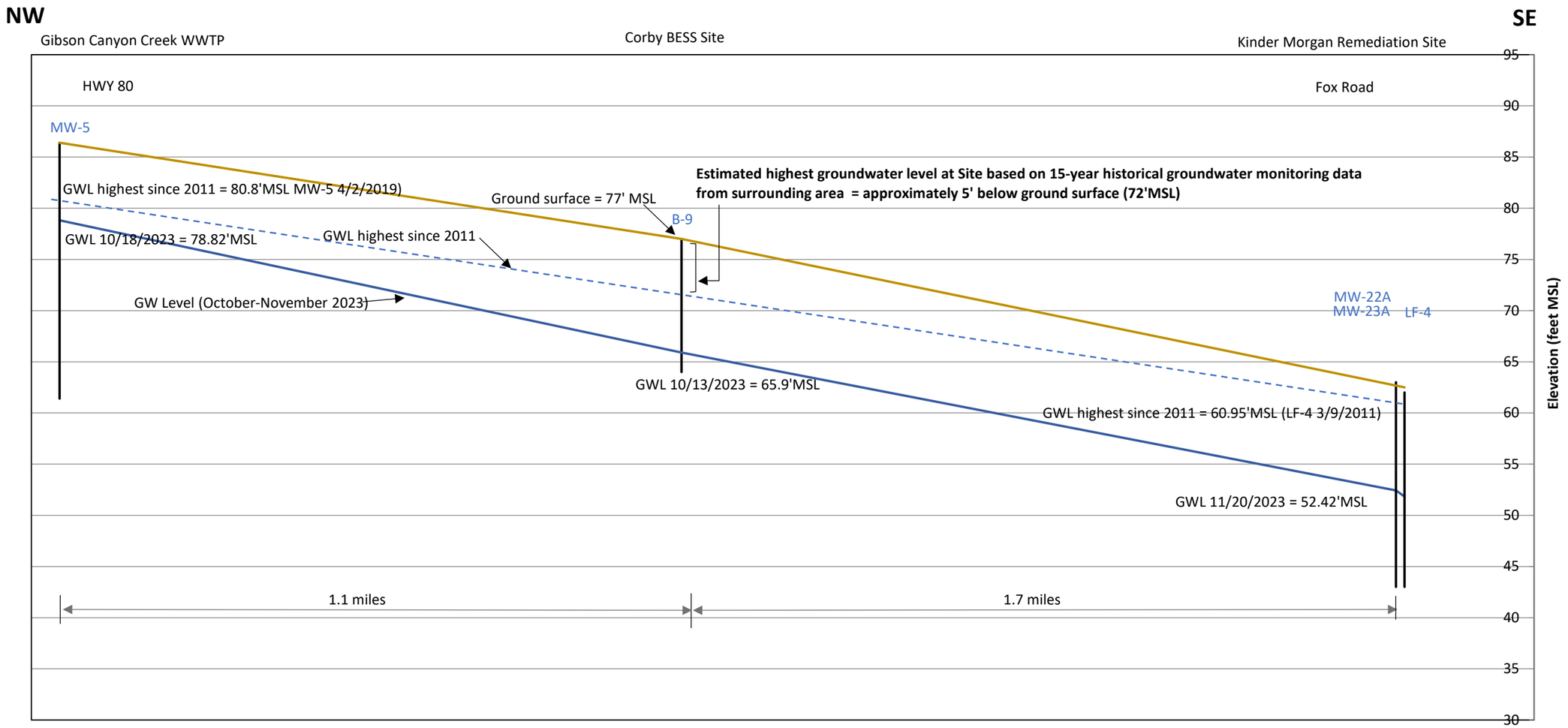
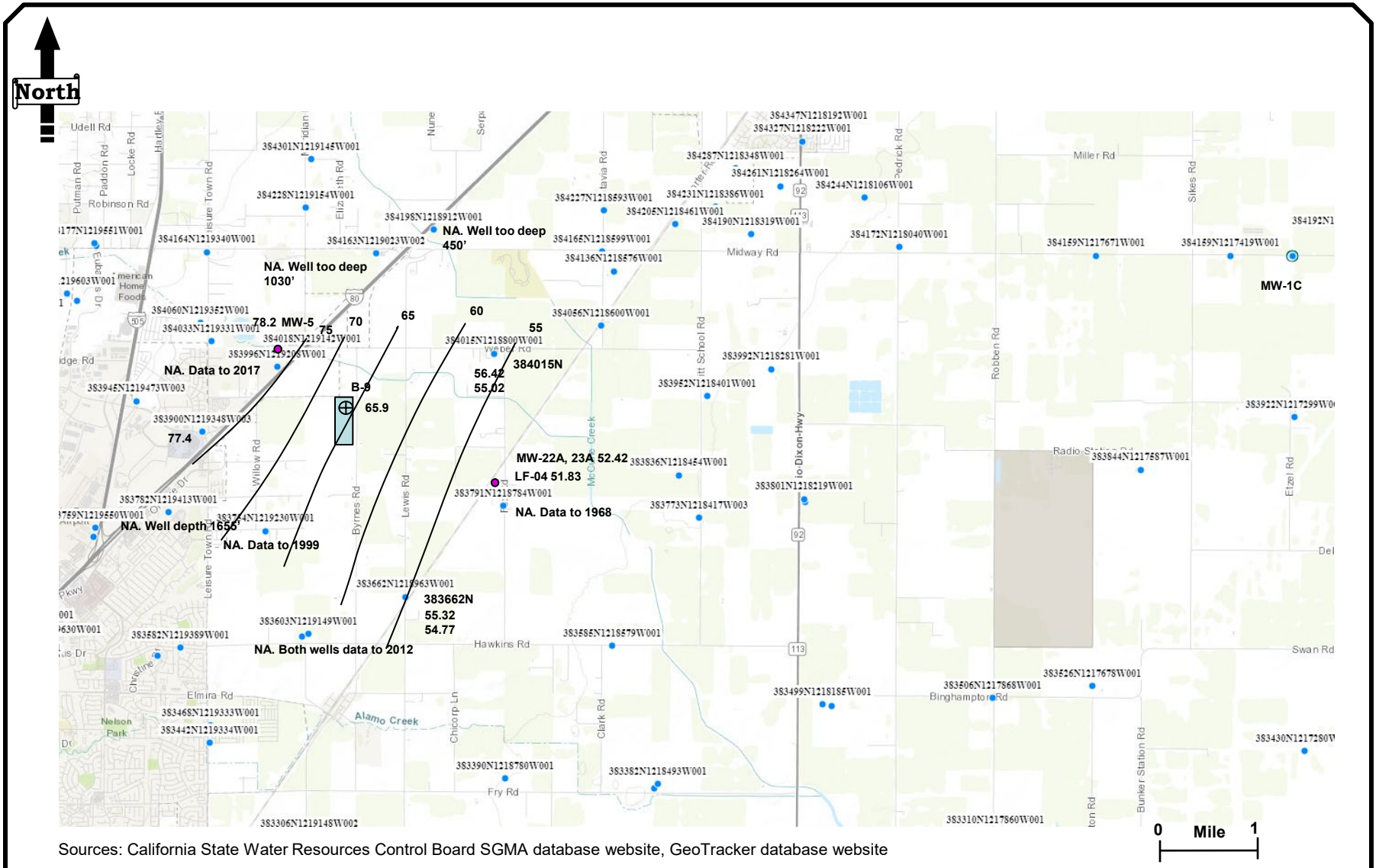


Figure 4
Cross-Section Plot - Groundwater Levels (October-November 2023)
Corby BESS, Solano County, CA





Sources: California State Water Resources Control Board SGMA database website, GeoTracker database website

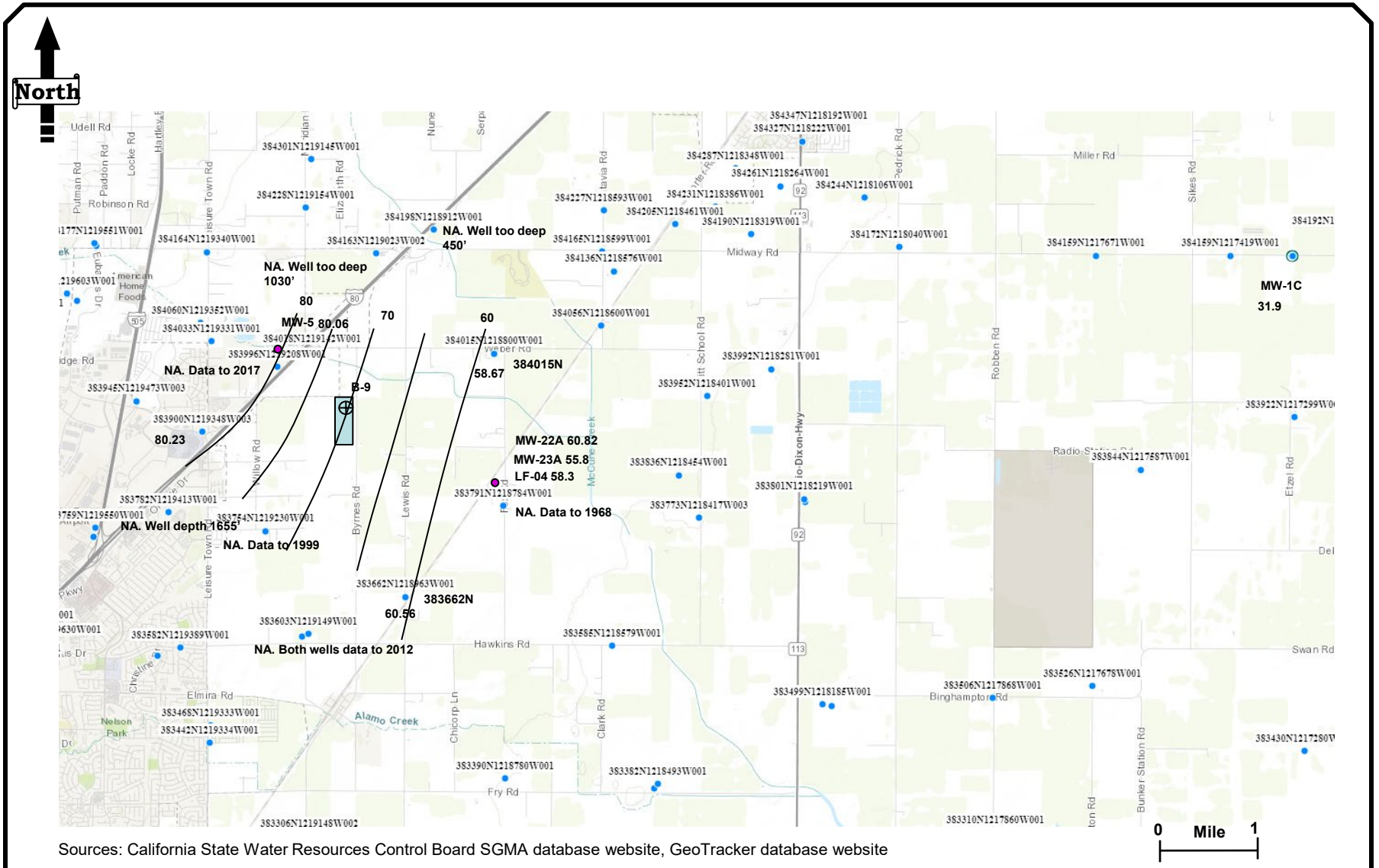
- Water Well / Monitoring Well Locations (SGMA database)
- Monitoring Well Locations (GeoTracker databse)

NA Data not available or not applicable

60.56 Groundwater surface elevation (feet amsl)

60 ---- Groundwater surface elevation contour line (feet amsl)

TITLE:	**Groundwater Elevation Contour Map October – November 2023**
LOCATION:	**Solano County, CA**
TETRA TECH	CK BY: / DRAFTED BY: / PROJ: / DATE:
FIGURE:	**5**



Sources: California State Water Resources Control Board SGMA database website, GeoTracker database website

- Water Well / Monitoring Well Locations (SGMA database)
- Monitoring Well Locations (GeoTracker databse)

NA Data not available or not applicable

60.56 Groundwater surface elevation (feet amsl)

60 ---- Groundwater surface elevation contour line (feet amsl)

TITLE:	**Groundwater Elevation Contour Map March 2024 Peak Event**
LOCATION:	**Solano County, CA**
TETRA TECH	CK BY: / DRAFTED BY: / PROJ: / DATE:
	FIGURE: **6**

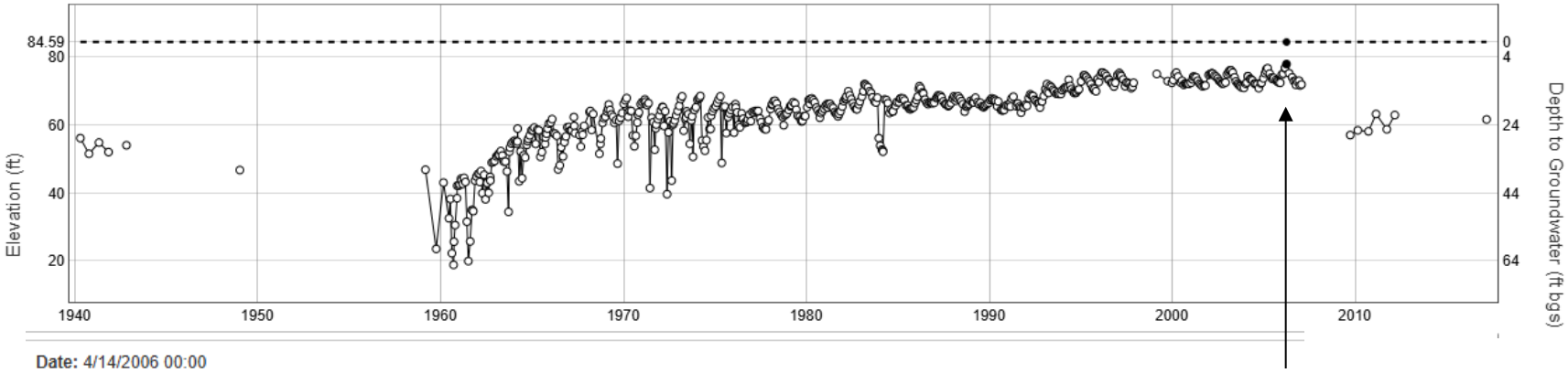
ATTACHMENT A

HYDROGRAPHS – ADDITIONAL WELLS 06N01W01B001M AND MW-15

Site Code: 383996N1219208W001 **State Well Number:** 06N01W01B001M **Local Well Name:** PG&E

Site Code: 383996N1219208W001
Local Well Name: PG&E
State Well Number: 06N01W01B001M
Station ID: 27642
WCR Number:
Latitude: 38.39960
Longitude: -121.92080
Station Organization ID:
Station Organization Name:
Well Location Description:
Well Use Type: Unknown
Well Completion Type: Single Well
Well Depth (feet bgs): 150
Top Perforation (feet bgs):
Bottom Perforation (feet bgs):
Ground Surface Elevation: 84.59
Reference Point Elevation: 84.59
Reference Point Description: None Provided
Station Comments:





Date: 4/14/2006 00:00

- ☑ ···· **Ground Surface: 84.59**
- ☑ — **Depth to Groundwater: 6.5**
- ☑ — **Groundwater Elevation: 78.09**
- ▬ **Current Ground Surface Elevation: 84.59**

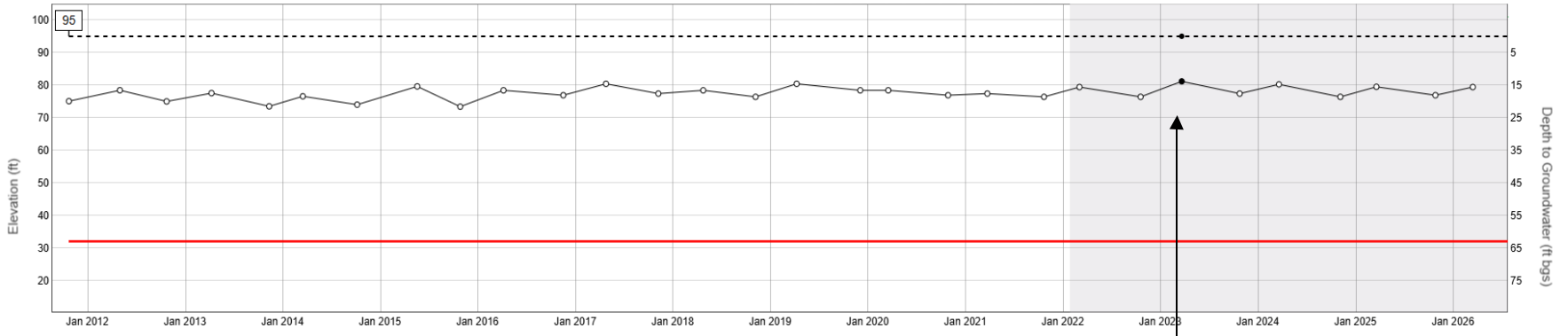
Source: California State Water Resources Control Board SGMA data viewer
https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevelswebsite,

TITLE:	**ATTACHMENT A - HYDROGRAPHS**
LOCATION:	**Solano County, CA**
TETRA TECH	CK BY: / DRAFTED BY: / PROJ: / DATE:
FIGURE:	

Site Code: 383900N1219348W001

Site Code:	383900N1219348W001
Local Well Name:	MW-15 188ft
Monitoring Network Type:	SGMA Representative
Station ID:	48482
Latitude:	38.39
Longitude:	-121.935
Well Depth (feet bgs):	188.0
Top Perforation (feet bgs):	158.0
Bottom Perforation (feet bgs):	178.0
Ground Surface Elevation:	95.0
Reference Point Elevation:	95.4
Sustainability Indicators:	Groundwater Levels,Groundwater Storage,Interconnected Surface Waters





Date: 3/22/2023 10:30

- **- - Ground Surface: 95**
- **— Groundwater Elevation: 81.15**
- **— Depth to Groundwater: 13.85**

Source: California State Water Resources Control Board SGMA data viewer
https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevelswebsite,

TITLE:	**ATTACHMENT A - HYDROGRAPHS**
LOCATION:	**Solano County, CA**
TETRA TECH	CK BY: / DRAFTED BY: / PROJ: / DATE: / FIGURE:

ATTACHMENT B

GROUNDWATER LEVEL DATA FILES IN EXCEL FORMAT

Name	Date modified	Type	Size
06N01E05A001M 015N Groundwater Elevation.xlsx	10/25/2026 9:56 PM	Microsoft Excel W...	24 KB
06N01E17M001M 662N Groundwater Elevation.xlsx	10/25/2026 9:57 PM	Microsoft Excel W...	24 KB
06N01W01B001M 996N Groundwater Elevation.xlsx	10/25/2026 10:38 PM	Microsoft Excel W...	49 KB
LF-4 KM GW Elev data.xlsx	10/25/2026 7:54 PM	Microsoft Excel W...	16 KB
MW-1C 38FT DWR daily GW Elev.xlsx	10/25/2026 9:57 PM	Microsoft Excel W...	1,379 KB
MW-5 Gibson Cyn Ck WWTP GW Elev data .xlsx	10/25/2026 8:08 PM	Microsoft Excel W...	80 KB
MW-15 188FT 900N Groundwater Elevation.xlsx	10/25/2026 9:58 PM	Microsoft Excel W...	13 KB
MW-22A 23A KM GW Elev data .xlsx	10/25/2026 7:52 PM	Microsoft Excel W...	20 KB

APPENDIX 2-B: GEOTECHNICAL LETTER OF MEMORANDUM WITH SUPPLEMENTAL GROUNDWATER DATA

www.RRCcompanies.com

810 Hesters Crossing Rd, Suite 120
Round Rock, TX 78681
512.992.2087

October 29, 2026

Mr. Ziad Abughali
NextEra Energy Resources, LLC
700 Universe Boulevard
Juno Beach, FL 33408

Re: **Geotechnical Letter - Foundation Design Recommendation Verification with Supplemental Groundwater Assessment**
Corby BESS Project
Solano County, California
RRC Project No. GE23006031

RRC Power & Energy, LLC (RRC) has performed review for the previously issued geotechnical reports of the Corby BESS project based on the updated groundwater data. RRC has previously issued "GE2306031_Geotechnical Report Rev.1_Corby BESS_06.10.2026", "GE2306031_Geotechnial Report Rev.1_SUB_Corby BESS_7.31.2026" and "GE2306031_Geotechnical Report Rev.2_T-Line_Corby BESS_08.17.2026".

This letter presents a review of foundation design recommendations, considering the supplemental groundwater assessment. RRC geotechnical investigation scopes included short-term groundwater level observations at each proposed facility area, the design groundwater levels for different shallow/deep foundations were recommended based on estimated long-term representative groundwater level at each specific foundation location. Supplemental groundwater assessment reported highest groundwater of about 5 feet below ground surface, which was considered as short-term condition during wet season over the year with limited impact on foundation long-term performance.

Shallow and deep foundation design recommendations (for BESS, Substation and gen-tie transmission line) included within previously issued geotechnical reports are considered valid for design purposes. If construction is performed during wet season, shallow groundwater mitigation shall be prepared by the construction contractor. Construction specifications may be addressed for the estimated highest groundwater level within IFC Drawings by different facility designers.

Should you have any questions concerning this design memorandum, please do not hesitate to contact us. Your business is always appreciated.

Sincerely,

RRC Power & Energy, LLC

Reviewed by

Manoj Keerthipati, PE.
Geotechnical Engineer

Prepared by

Yuqing “Jeffrey” Liu, PE.
Geotechnical Engineering Manager

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FIRM REGISTRATION NO. AL CA- 5474-E