

DOCKETED

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**Re: CURE Data Requests Set 3 for Black Rock Geothermal Project
(23-AFC-03)**

Dear Ms. Neumyer and Mr. Salamy:

California Unions for Reliable Energy (“CURE”) submits this third set of data requests to Black Rock Geothermal, LLC, an indirect wholly owned subsidiary of BHE Renewables, LLC, (“Applicant”) for the Black Rock Geothermal Project (“Project”), pursuant to Title 20, section 1716(b), of the California Code of Regulations. The requested information is necessary to: (1) more fully understand the Project; (2) assess whether the Project will be constructed and operated in compliance with all laws, ordinances, regulations, and standards; (3) assess whether the Project will result in significant environmental impacts; (4) assess whether the Project will be constructed and operated in a safe, efficient, and reliable manner; and (5) assess potential mitigation measures.

Pursuant to section 1716(f), written responses to these requests are due within 30 days. If you are unable to provide or object to providing the requested information by the due date, you must send a written notice of your objection(s) and/or inability to respond within 20 days.

Please contact me at kfederman@adamsbroadwell.com if you have any questions. Thank you for your cooperation with these requests.

Sincerely,



Kelilah D. Federman

Attachment
KDF:acp

6709-028acp

STATE OF CALIFORNIA
STATE ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

IN THE MATTER OF:

BLACK ROCK GEOTHERMAL PROJECT
(BRGP) APPLICATION FOR
CERTIFICATION

Docket No. 23-AFC-03

CALIFORNIA UNIONS FOR RELIABLE ENERGY
DATA REQUESTS SET 3

December 20, 2023

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Attorneys for California Unions for Reliable
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STATE OF CALIFORNIA
STATE ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

IN THE MATTER OF:

BLACK ROCK GEOTHERMAL PROJECT
(BRGP) APPLICATION FOR
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Docket No. 23-AFC-03

CALIFORNIA UNIONS FOR RELIABLE ENERGY
DATA REQUESTS SET 3

The following data requests are submitted electronically via California Energy Commission (“CEC”) Docket No. 23-AFC-03 by California Unions for Reliable Energy (“CURE”) to Black Rock Geothermal, LLC (“Applicant”). Please provide your responses as soon as possible, but no later than Thursday, January 18, 2024, to:

Kelilah D. Federman
Adams Broadwell Joseph & Cardozo
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South San Francisco, CA 94080
(650) 589-1660
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Please identify the person who prepared the Applicant’s responses to each data request. If you have any questions concerning the meaning of any data requests, please let us know.

**BLACK ROCK GEOTHERMAL PROJECT
CURE Data Requests Set 3 (Nos. 242-254)**

ELECTRIC TRANSMISSION

BACKGROUND:

The Application for Certification (“AFC”) at page 3-2 describes the Black Rock Geothermal Project’s (“BRGP”) transmission study evaluation as follows:

The Applicant applied to IID to interconnect the proposed generating plant to the IID transmission system. IID performed a cluster System Impact Study (SIS) to examine the impact from BRGP, along with nearby proposed projects, in the Salton Sea region near Calipatria, California. The SIS used power flows on the existing gen-tie line, transformers, short circuit duties of the existing transmission facilities, substations, and stability of the interconnected system, considering various contingencies and fault conditions, which determined the proposed plant and the collective 357 MW, creates system impacts and stability problems. The SIS identified necessary mitigation measures (IID system upgrades) required to be in place prior to BRGP connecting into the IID transmission system. The required mitigation plan upgrades are described in the SIS and provided as a confidential filing. When the mitigation plan is implemented, the addition of ENGP and related gen-tie line will increase operator flexibility for maintaining the transmission system during steady state and contingency conditions. The single-line drawing for the project is provided as Figures 3-2a and 3-2b...

The SIS analysis indicates that the proposed Project can be connected to the IID transmission system at the proposed IID 230 kV switching station to be constructed as part of the IID system upgrades. **A redacted version of the SIS analysis is provided as Appendix 3A.**

Although the AFC states that a redacted version of the System Impact Study (“SIS”) is provided, no such document is publicly available on the BRGP docket.

DATA REQUESTS:

242. Provide the redacted SIS (System Impact Study), which is referenced at AFC page 3-2 as provided as Appendix 3A.

BACKGROUND:

California Energy Commission (“CEC”) staff requested information related to the BRGP’s SIS in Data Requests Set 1, nos. 83 through 98 (TN 252096). To support its requests, CEC staff explained:

The California Environmental Quality Act (CEQA) requires the identification and description of the “Direct and indirect significant effects of the project on the environment.” The Application for Certification requires discussion of the “energy resource impacts which may result from the construction or operation of the power plant.” For the identification of impacts on the transmission system resources and the indirect or downstream transmission impacts, staff relies on the Phase I and Phase II Interconnection Studies for ensuring the interconnecting grid meets the California Independent System Operator (California ISO) reliability standards. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards. When the studies determine that the project will cause a violation of reliability standards, the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include the construction of downstream transmission facilities. CEQA requires the analysis of any downstream facilities for potential indirect impacts of the proposed project. **Without a complete Phase I or Phase II Interconnection Study, staff is not able to fulfill the CEQA requirement to identify the indirect effects of the proposed project.**

Specifically, Data Request No. 83 (TN 252096) requested a copy of “all the appendix and attachments” to the SIS, in relevant part. The Applicant responded that the “Applicant is confirming with IID if additional attachments can be provided.” (TN 252492-1) Furthermore, Data Request No. 85 (TN 252096) requested a copy of the “IID Switching Station one-line diagram with the proposed project interconnection.” The Applicant responded that the “Applicant is confirming with IID if the preliminary one-line diagram for the IID Switching Station can be provided.” (TN 252492-1)

On October 3, 2023, the Applicant submitted a Repeated Application for Confidential Designation for the following response to CEC staff’s Data Requests Set 1 (TN 252497):

- Response to Data Request Number 90: Imperial Irrigation District (“IID”) BHE Cluster System Impact Study (“SIS”), appendices, and attachments; and
- Response to Data Request Number 94: IID Switching Station One-line Diagram

On October 19, 2023, CEC designated the following data as confidential (TN 252653):

- DRR 90 – IID BHE Cluster System Impact Study
- DRR 90 – Appendix D 2026 Heavy Summer Transient Stability Results
- DRR 90 – Appendix E 2026-2027 Light Winter Sensitivity Transient Stability Results
- DRR 90 – Appendix F Post Transient (Reactive Margin)
- DRR 90 – Appendix G Short Circuit Results
- DRR 94 – IID Switching Station One-line Diagram

To the extent any of the above information may be available in a redacted or excerpted version, CURE is requesting disclosure of this information, which is directly relevant to the BRGP’s direct impacts on the transmission system as well as the downstream transmission impacts.

DATA REQUESTS:

243. Provide the redacted version of Data Request Response (“DRR”) 85 - Imperial Irrigation District (“IID”) Switching Station One-line Diagram (TN 252650).
244. Provide the redacted version of DRR 83 - Appendix G Short Circuit Results (TN 252649).
245. Provide the redacted version of DRR 83 - Appendix F Post Transient (Reactive Margin) (TN 252648).
246. Provide the redacted version of DRR 83 - Appendix E 2026-2027 Light Winter Sensitivity Transient Stability Results (TN 252647).
247. Provide the redacted version of DRR 83 - Appendix D 2026 Heavy Summer Transient Stability Results (TN 252646).
248. Provide the redacted version of DRR 83 - IID BHE Cluster System Impact Study (TN 252645).

Dated: December 20, 2023

Respectfully submitted,

Original Signed by:

/s/ Kelilah D. Federman

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