DOCKETED	
Docket Number:	24-OPT-04
Project Title:	Potentia-Viridi Battery Energy Storage System
TN #:	259038
Document Title:	Determination of Incomplete Application and Request for Information for the Potentia-Viridi Battery Energy Storage System
Description:	N/A
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CALIFORNIA ENERGY COMMISSION

CALIFORNIA NATURAL RESOURCES AGENCY

September 6, 2024

Kelene Strain
Environmental and Permitting Manager
Capstone Infrastructure Corporation
155 Wellington Street West, Suite 2930
Toronto, Ontario Canada
M5V 3H1

Determination of Incomplete Application and Request for Information for the Potentia-Viridi Battery Energy Storage System (Docket No. 24-OPT-04)

Dear Kelene Strain:

California Energy Commission (CEC) staff confirmed receipt on August 7, 2024, of an Opt-In Application for Potentia-Viridi Battery Energy Storage System (project). Levy Alameda, LLC ("Applicant"), a wholly owned subsidiary of Obra Maestra Renewables, LLC, proposes to construct, operate, and decommission a 400-megawatt battery energy storage system (BESS) on approximately 85 acres in eastern Alameda County.

The primary components of the project include an up to 3,200-megawatt-hour BESS facility, an operations and maintenance building, a project substation, a 500-kilovolt overhead intertie transmission (gen-tie) line, and interconnection facilities within the Pacific Gas and Electric Company (PG&E) owned and operated Tesla Substation. The project would draw electricity from the power grid to charge and store electrical energy and discharge back to the power grid when the stored energy is needed.

The CEC staff has finished its review of the project application pursuant to California Code of Regulations, title 20, section 1877, which specifies the required contents of an Opt-In application and Public Resources Code, section 25545.4(a), which states, "within 30 days of the submission of the application, the commission shall review the application and make a determination of completeness." Based on this review, staff has determined the submitted application is incomplete.

Pursuant to Public Resources Code, section 25545.4(b), CEC staff requires the information described in the attachments to this letter to be submitted. The attachments consist of: (1) data completeness worksheets listing the requirements

specified in statute and regulations; and (2) requests for additional information needed for staff to complete its environmental analysis of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to perform a related review for opt-in applications. Staff's review of the application has identified an initial topic of concern that could impact the project: the site is under a California Land Conservation Act (Williamson Act) contract. This concern is fully described in the attached data requests.

All requested information is reasonably necessary to prepare an Environmental Impact Report as part of a CEC Staff Assessment and to support a decision on the application, including all the findings required in Chapter 6.2 of Division 15 of the Public Resources Code sections 25545 et seq.

Staff asks the applicant to file complete responses by technical area to the requested data in as few submittals as possible and provide an estimated timeline of when the remaining data will be submitted. Staff asks that upon submitting complete responses, the applicant provide a statement that its response to the request for information is complete and addresses all identified deficiencies.

Consistent with Public Resources Code, section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, CEC staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter.

If you have any questions about the information identified as necessary to complete the application, please email the CEQA project manager, Ann Crisp, at ann.crisp@energy.ca.gov.

Sincerely,

Drew Bohan
Executive Director

Attachments
Attachment A: Data Completeness Worksheets for Title 20, section 1877
Attachment B: Data Requests

Attachment A

Data Completeness Worksheets
for Title 20, section 1877

Potentia-Viridi Battery Energy Storage System (24-OPT-04) Completeness Review

Incomplete

1. Mandatory Opt-in Requirements
2. Air Quality (includes Greenhouse Gases)
3. Alternatives
4. Biological Resources
5. Cultural/Tribal Cultural Resources
6. Executive Summary
7. Geological Hazards
8. Hazardous Materials Handling
9. Land Use
10. Noise
11. Paleontological Resources
12. Project Description
13. Public Health
14. Socioeconomics
15. Soils
16. Traffic and Transportation
17. Transmission System Safety and Nuisance
18. Transmission System Design
19. Visual Resources
20. Waste Management
21. Water Resources
22. Wildfire
23. Worker Safety

Complete

1. Efficiency, Energy, and Energy Resources
2. Facility Design
3. Reliability

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Mandatory Opt-In Requirements** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Various

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
AUTHORITY AND VERIFICATION				
Cal. Code Regs., tit. 20 § 1707	Every notice and application shall be dated and signed by the applicant attesting under penalty of perjury to its truth and accuracy.	Cover Letter, p. 3	Yes	
"FACILITY" OR "DISCRETIONARY PROJECT" DEFINTION MET				
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)	Explanation of how the facility meets one or more of the definitions of "facility":	--	--	
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)(4)	If the opt-in application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application shall contain a detailed description of how the facility meets the criteria specified in section 25545(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technologies.	Subsection 2.1, pp. 2-1 to 2-10, Tables 2-1 and 2-2; Figure 2-4 and 2-5; Appendix 2A, pp. 4 to 5	No	See DR MAND-1
REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE				
Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.	Appendix 1D, pp. 1 to 4	Yes	

DATA COMPLETENESS WORKSHEET

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Technical Area: **Mandatory Opt-In Requirements** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Various

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	--	--	--
Pub. Resources Code, § 25545.3.3(a)	The entirety of the construction of the covered project is a public work.	N/A	N/A	
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following apply:	--	--	--
Pub. Resources Code, § 25545.3.3(b)(1)	Applicant ensures that the prevailing wage requirement is included in all contracts for the performance of all construction work.	Appendix 1D, p. 1	Yes	

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(2)	Contractors and subcontractors must pay all construction workers employed in the construction of the project at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.	Appendix 1D, p. 1	Yes	
Pub. Resources Code, § 25545.3.3(b)(3)	Contractors and subcontractors performing construction work on the project shall employ apprentices at no less than the ratio required in the Labor Code section 1777.5.	Appendix 1D, p. 3	Yes	
Pub. Resources Code, § 25545.3.3(b)(4)	Except as provided in (b)(6), all contractors and subcontractors performing construction work shall maintain and verify payroll records pursuant the Labor Code section 1776, make those records available for inspection and copying, and furnish those payroll records to the Labor Commissioner pursuant to the Labor Code section 1771.4.	Appendix 1D, p. 1	Yes	
Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	Appendix 1D, pp. 2 to 3	Yes	

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	--	--	--
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	Appendix 1D, p. 2	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	Appendix 1D, p. 2	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 1D, p. 2	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 1D, p. 2	Yes	

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Technical Area: **Mandatory Opt-In Requirements** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Various

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	--	--	--
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	Appendix 1D, p. 2	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	Appendix 1D, p. 2	Yes	
Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	Appendix 1D, pp. 2 to 3	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	Appendix 1D, p. 3	Yes	

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	--	--	--
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	Appendix 1D, p. 3	Yes	
Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	Appendix 1D, p. 3	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix 1D, p. 3	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix 1D, p. 3	Yes	
PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)				

DATA COMPLETENESS WORKSHEET

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	Section 3.1, Subsection 3.1.5.3, pp. 3.1-28 to 3.1-29	No	See DR AQ-5 to DR AQ-7, DR WATER-7, DR BIO-66 and DR BIO-79
IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA				
Cal. Code Regs., tit. 20, § 1877(e)	Identify whether the project is, on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	Subsection 3.4.1.3.4, p. 3.4-4; Subsection 3.2.1.2, pp. 3.2-2 to 3.2-3; Subsection 3.2.1.2.2, pp. 3.2-3 to 3.2-4; Figure 3.2-1, p. 3.2-47	Yes	
NET POSITIVE ECONOMIC BENEFIT TO THE LOCAL GOVERNMENT				

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1877(f)	Identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. Staff must provide the submitted information to the local government for review and comment.	Subsection 1.4, p. 1-6; Subsection 3.10.1, p. 3.10-1; Subsection 3.10.2.3, pp. 3.10-16 to 3.10-17 and pp. 3.10-18 to 3.10-19; Appendix 1C; Appendix 3.10A (Confidential) pp. 16, 19 to 20, 26, 32 to 33, and 35 to 39	No	See DR MAND-2
Cal. Code Regs., tit. 20 § 1879(a)(7); Pub. Resources Code § 25545.9	... economic benefits may include, but are not limited to the following: (a) Employment growth. (b) Housing development. (c) Infrastructure and environmental improvements. (d) Assistance to public schools and education. (e) Assistance to public safety agencies and departments. (f) Property taxes and sales and use tax revenues.	Subsection 1.4, p. 1-6; Subsection 3.10.1, p. 3.10-1; Subsection 3.10.2.3, pp. 3.10-16 to 3.10-17, 3.10-18 to 3.10-19; Appendix 1C; Appendix 3.10A (Confidential) pp. 16, 19 to 20, 26, 32 to 33, and 35 to 39	No	See DR MAND-2
LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT				
Cal. Code Regs., tit. 2, § 1877(g) ; Pub. Resources Code § 25545.10	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations prior to project certification, consistent with Public Resources Code section 25545.10.	Appendix 1C	Yes	
ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS				

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Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.		No	See DR MAND-3
Pub. Resources Code § 21183(a)	The project will result in a minimum investment of $100,000,000 in California upon completion.		No	See DR MAND-4
Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	Appendix 1D	No	See DR MAND-5
Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.		No	See DR MAND-6 and DR GHG-2

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OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	Section 3.14.3.3, pp.3.14-3 – 8: Appendix 1I, Section 5, p. 15.	Yes	
Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.		No	See DR MAND-3
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...		No	See DR MAND-3
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...		No	See DR MAND-3

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Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.		No	See DR MAND-3
Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 21180(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	--	--	--
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	Subsection 3.1.3.1	No	See DR MAND-6

Pub. Resources Code § 21183.6(a)(2)	Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority: 1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to, energy efficiency, installation of renewable energy electricity generation, and reductions in vehicle miles traveled. 2. The remaining unmitigated impacts shall be mitigated by direct emissions reductions that also reduce emissions of criteria air pollutants or toxic air contaminants within the same air pollution control district or air quality management district in which the project is located. 3. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate within the same air pollution control district or air quality management district in which the project is located. The offsets shall be undertaken in a manner consistent with the Health and Safety Code section 38500, including, but not limited to, the requirement that the offsets be real, permanent, quantifiable, verifiable, and enforceable, and shall be undertaken from sources in the community in which the project is located or in adjacent communities. 4. The remaining unmitigated impacts shall be mitigated through the use of offsets	Application and Appendix B Requirements Crosswalk Matrix for Environmental Document	No	See DR MAND-6, DR GHG-1, DR GHG-2, DR GHG-3, DR GHG-7, DR GHG-8

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

OPT-IN STATUTES / REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	that originate from sources that provide a specific, quantifiable, and direct environmental and public health benefit to the region in which the project is located.			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.1, Subsection 3.1.3, pp. 3.1-11 to 3.1-18; Subsection 3.1.4, pp. 3.1-18 to 3.1-27	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.1, Subsection 3.1.4, pp. 3.1-18 to 3.1-27	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 3.1, Subsection 3.1.8, pp. 3.1-30	Yes	

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Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 3.1, pp. 3.1-1 to 3.1-10	No	See DR AQ-1, DR AQ-2, DR AQ-4, DR GHG-1 to DR GHG-8
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	Section 3.1, Subsection 3.1.5.3, pp. 3.1-28 to 3.1-29	No	See DR AQ-5
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	Section 3.1, Subsection 3.1.3.2.2, pp. 3.1-17 to 3.1-18	No	See DR AQ-1

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Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Section 3.1, Subsection 3.1.4, pp. 3.1-18 to 3.1-27	No	See DR AQ-1 and DR AQ-4
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	N/A	N/A	N/A
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO2, CH4, N2O, and SF6) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Section 3.1, Subsection 3.1.4, pp. 3.1-18 to 3.1-27; Appendix 3.1A, Subsection 4	No	See DR AQ-1, DR GHG-1, DR GHG-2, and DR GHG-5 to GHG-8
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	N/A	N/A	N/A
Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	Section 3.1, Subsection 3.1.2.2, Table 3.1-2	Yes	
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Section 3.1, Subsection 3.1.1.1, Section 3.9, Subsection 3.9.2.2, Table 3.9-1, Air quality modeling files	Yes	

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Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	N/A	N/A	N/A
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Section 3.9, Subsection 3.9.2.2, Table 3.9-1, Air quality modeling files	Yes	
Appendix B (g) (8) (I)	An evaluation of the project's direct and cumulative air quality impacts, consisting of:	--	--	--
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM_{10}) emissions from grading, excavation and site disturbance, as well as the combustion	Section 3.1, Subsection 3.1.4, pp. 3.1-18 to 3.1-22, Table 3.1-7; Appendix 3.1B	No	See DR AQ-8 to DR AQ-13

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Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	emissions [nitrogen oxides (NO_x), sulfur dioxide (SO_2), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM_{10}) and particulate matter less than 2.5 microns in diameter (PM2.5) from construction-related equipment;			
Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO_x, SO_2, CO, $PM_{10,}$ and $PM_{2.5}$) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;	Section 3.1, Subsection 3.1.4, p. 3.1-22	No	See DR AQ-2

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

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Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	Section 3.1, Subsection 3.1.4, p. 3.1-22 to 3.1-24	No	See DR AQ-3
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO_X, SO_2, CO, PM_{10}, and $PM_{2.5}$.	Section 3.1, Subsection 3.1.4, p. 3.1-22	No	See DR AQ-2
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide the following information:	--	--	--

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Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	N/A	N/A	N/A
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	Section 3.1, Subsection 3.1.3.1, p. 3.1-11 to 3.1-13	Yes	
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Section 3.9, Subsection 3.9.4.2, p. 3.9-7; Appendix 1E, Subsection 3.1, p. 7	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with	Section 3.1, Subsection 3.1.5, pp. 3.1-27 to 3.1-29	No	See DR GHG-4

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Technical Area: **Air Quality** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 3.1, Subsection 3.1.6, pp. 3.1-29	No	See DR AQ-6
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 3.1, Subsection 3.1.6, pp. 3.1-29	No	See DR AQ-7
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.1, Subsection 3.1.7, pp. 3.1-29	No	See DR AQ-5

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Technical Area: **Alternatives** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Jeanine Hinde

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.	Section 2, p. 2-19; Section 4, pp. 4-1 to 4-21	No	See DR ALT-1
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).	Section 4, pp. 4-1 to 4-21	No	See DR ALT-1

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Technical Area: **Biological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Tia Taylor/CDFW

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 3.2, pp. 3.2-1 to 3.2-60; Appendices 3.2A, 3.2B, 3.2D, 3.2E, 3.2-F, 3.2G, 3.2H, 3.2L	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.2, pp. 3.2-1 to 3.2-60; Appendices 3.2A, 3.2B, 3.2G, 3.2H, 3.2L	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 3.2, pp. 3.2-1 to 3.2-60; Appendices 3.2A, 3.2B, 3.2G, 3.2H, 3.2L	Yes	
[OPT-IN ONLY] Cal. Code Regs., tit. 20, § 1877 (a)	If the applicant is seeking incidental take authorization as described in California Fish and Game Code section 2081(b), the application shall include the information required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10). If the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602(a)(1)(A)-(F).	Section 3.2, pp. 3.2-1 to 3.2-60; Appendices 3.2E and 3.2-F	No	See DR BIO-1 to DR BIO-32 and DR BIO-47

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 3.2, Subsections 3.2.1, 3.2.3, 3.2.4, and 3.2.5	No	See DR BIO-33 to DR BIO-43
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic wildlife resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity Database (CNDDB), and a citation which includes the date the CNDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing	Subsection 3.2.1, pp. 3.2-2 to 3.2-7; Subsection 3.2.9, p. 3.2-41, Figure 3.2-1; Figure 3.2-4; Appendix 3.2C (Confidential)	No	See DR BIO-44 and BIO-45

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include:			
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	Section 3.2, Subsection 3.2.1.4; Appendix 3.2A	Yes	
Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380;	Section 3.2, Subsection 3.2.1.5; Appendix 3.2A	Yes	
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Section 3.2, Subsection 3.2.1.4, 3.2.1.7; Appendix 3.2A	Yes	
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Section 3.2, Subsection 3.2.1.7.3; Appendix 3.2A	Yes	
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the CNDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission or other responsible agency;	Section 3.2, Subsection 3.2.1.4, 3.2.1.3.2; Appendix 3.2A	Yes	

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances;	Section 3.2, Subsection 3.2.1.4, 3.2.1.3.1, 3.2.1.5, 3.2.1.7; Appendix 3.2A	Yes	
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Section 3.2; Appendix 3.2A	Yes	
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Section 3.2, Subsection 3.2.3.2	Yes	
Appendix B (g) (13) (B)	Include a list of the species and habitat(s) observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors. Maps or aerial photographs shall include the following:	Section 3.2, Figures 3.2-1, 3.2-2, 3.2-3, 3.2-4, 3.2-6; Appendix 3.2A, Figure 2	Yes	
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under confidential cover) and 1:350,000 (for public viewing) that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDB, and the associated areas where biological	Section 3.2, Figures 3.2-4 and 3.2-6	No	See DR BIO-44 and BIO-45

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	surveys were conducted. Label the biological resources and survey areas as well as the project facilities.			
Appendix B (g) (13) (B) (ii)	Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided.		No	See DR BIO-46
Appendix B (g) (13) (B) (iii)	An aerial photo depicting state and federal jurisdictional features including state waters and wetlands delineated on maps at a scale of (1:2,400) showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance if wetlands occur within 250 feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application, Regional Water Quality Control Board (RWQCB) application, or California Department of Fish and Wildlife Section 1600 et seq. permit requirements. For projects proposed to be located within the coastal zone, also provide aerial	Section 3.2, Figure 3.2-7	No	See DR BIO-48

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	photographs or maps as described above that identify wetlands as defined by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Kiteworks	No	See DR BIO-49
Appendix B (g) (13) (C)	A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate biological resources including the following:	Section 3.2, Subsections 3.2.3, 3.2.3.2; Appendix 3.2A	Yes	
Appendix B (g) (13) (C) (i)	A list of sensitive species and habitats with a potential to occur (defined in (A) above) and include status (state, federal, California Native Plant Society, global rank, state rank, etc.)	Section 3.2; Appendix 3.2A	Yes	
Appendix B (g) (13) (C) (iii)	Perform nitrogen deposition modeling including the complete citation for		No	See DR BIO-46

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	references used in determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.			
Appendix B (g) (13) (D)	A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDB records and field survey forms completed by the applicant's biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include:	Section 3.2, Subsection 3.2.1.5, pp. 3.2-7 to 3.2-10, Subsections 3.2.1.6 and 3.2.1.7; Appendix 3.2A, Subsections 4.3 and 5; Appendix 3.2E, Chapter 3; Appendix 3.2D, Appendix D, Section 4; Appendix 3.2 B	No	See DR BIO-50 to DR BIO-55 and DR BIO-67 to DR BIO-75
Appendix B (g) (13) (D) (i)	Current biological resources surveys conducted using appropriate field survey protocols (include references) during the appropriate season(s). State and federal agencies with jurisdiction shall be consulted for field survey protocol	Section 3.2, Subsection 3.2.1.5, pp. 3.2-7 to 3.2-10 Subsections 3.2.1.6 and 3.2.1.7;Appendix 3.2A Subsections 4.3 and 5; Appendix 3.2E, Chapter 3;	No	See DR BIO-56

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	guidance prior to surveys if a protocol exists.	Appendix 3.2D, Appendix D, Section 4		
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.	Section 3.2, Subsection 3.2.1.2, pp. 3.2-2 to 3.2-3, Subsection 3.2.1.5, p. 3.2-9;,Subsection 3.2.3.2, p. 3.2-24; Appendix 3.2 A, Section 4.3, Subsection 4.3.7 p. 21, Section 5, Subsection 5.2, p. 23, Appendix A, Figure 3, Appendix 3.2 D, Appendix D, Subsections 4.5 and 5.3, Appendix F; Appendix 3.2 E, Appendix B, Subsections 4.3.8 and 5.2	No	See DR BIO-57 and DR BIO-79
Appendix B (g) (13) (E))	Impacts discussion of all impacts (direct, indirect, and cumulative) to biological resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Discussion shall also address sensitive species habitat impacts from air emissions (i.e., nitrogen deposition);	Section 3.2, Subsection 3.2.3 and Subsection 3.2.4; Appendix 3.2 A, Section 6; Appendix 3.2 D, Sections 7 and 8; Appendix 3.2 E, Chapter 3 and 4	No?	See DR BIO-58 and BIO-46
Appendix B (g) (13) (F)	A discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level	Section 3.2, Subsection 3.2.5, pp. 3.2-27 to 3.2-32; Appendix 3.2 A, Section 3, Subsection 3.3.1 pp. 13 to	No	See DR BIO-59 and DR BIO-76 to DR BIO-78

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Technical Area: **Biological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Tia Taylor/CDFW

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of impacts, including, but not limited to the following:	14, Section 3.2, Subsection 3.2.3, pp. 3.2-20 to 3.2-27 Section 3.2, Subsection 3.2.4, p. 3.2-27; Appendix 3.2 A, Section 6, Appendix 3.2 D, Sections 7 and 8; Appendix 3.2 E, Chapter 4 and 5		
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Section 3.2, Subsection 3.2.5, pp. 3.2-27 to 3.2-32; Appendix 3.2 A, Section 3, Subsection 3.3.1 pp. 13 to 14; Appendix 3.2 D, Sections 7; Appendix 3.2 E, Chapter 5	No	See DR BIO-59 and DR BIO-76 to DR BIO-78
Appendix B (g) (13) (F) (ii)	All off-site habitat mitigation such as habitat improvement or compensation including management, and an identification of appropriate agency contacts for coordination and verification of proposed habitat mitigation measures.	Section 3.2, Subsection 3.2.3.2, p. 3.2-27, Subsection 3.2.5.1, p. 3.2-30; Appendix 3.2 A, Subsection 3.3.1 p. 11, Subsection 6, pp. 33 to 36, Section Appendix G; Appendix 3.2 E, Chapter 5; Appendix 3.2 D, Sections 7 and 8	No	See DR BIO-60
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during construction and operation to protect biological resources.	Section 3.2.5.1, p. 3.2-28	No	See DR BIO-61

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Biological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Tia Taylor/CDFW

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (13) (G)	A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project.	Section 3.2, Subsection 3.2.5, pp. 3.2-27 to 3.2-32; Appendix 1H	No	See DR BIO-62
Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.		No	See DR BIO-63 and DR BIO-79
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 3.2, Subsection 3.2.6, pp. 3.2-32 to 3.2-33	No	See DR BIO-64
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits,	Section 3.2, Subsection 3.2.6, pp. 3.2-32 to 3.2-33	No	See DR BIO-65

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Biological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Tia Taylor/CDFW

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 3.2, Subsection 3.2.8, p. 3.2-40	No	See DR BIO-65
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.2, Subsection 3.2.7, p. 3.2-40	No	See DR BIO-66 and DR BIO-79

DATA COMPLETENESS WORKSHEET

Completeness:	Complete ___ Incomplete **X**			Revision No. 0 Date:	September 2024
Technical Area:	**Cultural Resources and Tribal Cultural Resources**	Project:	Potentia-Viridi Battery Energy Storage System	Technical Staff:	William Larson/Cameron Travis
Project Manager:	Ann Crisp	Docket:	24-OPT-04	Technical Senior:	Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A), 1877(a)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Subsections 3.3.2 and 3.3.4, pp. 3.3-4 to 3.3-14; Appendix 3.3A, pp. 47, 48	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.3.2, pp. 3.3-4 to 3.3-10; Subsections 3.3.4–3.3.6, pp. 3.3-11 to 3.3-15; Appendix 3.3A, pp. 47 to 55	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Subsection 3.3.10, p. 3.3-21; Appendix 3.3A, p. 58	No	See DR CUL/TRI-1
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference	Subsection 3.3.4, pp. 3.3-1, 3.3-2, 3.3-9, 3.3-10, 3.3-12 to 3.3-15; Table 3.3-2; Appendix 3.3A, pp. 35, 38, 44, 45, 47, 48, 54 to 57, Table 4-2	Yes	

DATA COMPLETENESS WORKSHEET

Completeness:	Complete ___ Incomplete **X**			Revision No. 0 Date:	September 2024
Technical Area:	**Cultural Resources and Tribal Cultural Resources**	Project:	Potentia-Viridi Battery Energy Storage System	Technical Staff:	William Larson/Cameron Travis
Project Manager:	Ann Crisp	Docket:	24-OPT-04	Technical Senior:	Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features, areas, places, records, sacred places, cultural landscapes, or manuscripts, all of which may have significance according to criteria outlined in sections 21074 and 21084.2 of the Public Resources Code.	---	--	-
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location. This regional summary must address the potential for buried cultural resources and tribal cultural resources to occur in the project area. The summary, together with literature search results, must inform the field methods employed for identifying cultural resources and tribal cultural resources in the project area.	Subsection 3.3.1, pp. 3.3-1 to 3.3-3; Appendix 3.3A, pp. 35 to 45	Yes	
Appendix B (g) (2) (B)	The results of a literature search to identify cultural resources and tribal cultural resources within an area not less than a 1-mile radius around the project site and not less that than one-quarter (0.25) mile on each side of the linear	Subsection 3.3.2, pp. 3.3-4 to 3.3-10; Appendix 3.3A, pp. 49 to 55; Confidential Appendix 3.3B, Confidential Record Search Results	No	See DR CUL/TRI-2 and DR CUL/TRI-3

DATA COMPLETENESS WORKSHEET

Completeness:	Complete ___ Incomplete **X**			Revision No. 0 Date:	September 2024
Technical Area:	**Cultural Resources and Tribal Cultural Resources**	Project:	Potentia-Viridi Battery Energy Storage System	Technical Staff:	William Larson/Cameron Travis
Project Manager:	Ann Crisp	Docket:	24-OPT-04	Technical Senior:	Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	facilities. Identify any cultural resources or tribal cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources and tribal cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR §4853) shall be provided for all cultural resources and tribal cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports			

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: William Larson/Cameron Travis

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.			
Appendix B (g) (2) (C)	The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources and tribal cultural resources must be completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards for the technical area addressed. New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes.	Subsection 3.3.2, p. 3.3-10; Appendix 3.3A	No	See DR CUL/TRI-4 and DR CUL/TRI-5

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Completeness:	Complete ___ Incomplete **X**			Revision No. 0 Date:	September 2024
Technical Area:	**Cultural Resources and Tribal Cultural Resources**	Project:	Potentia-Viridi Battery Energy Storage System	Technical Staff:	William Larson/Cameron Travis
Project Manager:	Ann Crisp	Docket:	24-OPT-04	Technical Senior:	Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel's distance from all proposed plant site boundaries. New historic architecture field reconnaissance ("windshield survey") in urban and suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age. A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if			

DATA COMPLETENESS WORKSHEET

Completeness:	Complete ___ Incomplete **X**			Revision No. 0 Date:	September 2024
Technical Area:	**Cultural Resources and Tribal Cultural Resources**	Project:	Potentia-Viridi Battery Energy Storage System	Technical Staff:	William Larson/Cameron Travis
Project Manager:	Ann Crisp	Docket:	24-OPT-04	Technical Senior:	Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	archaeological resource or other sensitive resource locations are included). Information included in the technical report shall also be provided in the application, other sensitive resources, or areas of religious significance) shall be submitted under a request for confidentiality pursuant to California Code of Regulations, title 20, section 2501 et seq. At a minimum, the technical report shall include:			
Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	Appendix 3.3A, pp. 49 to 52; Confidential Appendix 3.3B, Confidential Records Search Results	Yes	
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural and tribal cultural resources and a discussion of the cultural and tribal resources identified by the survey;	Appendix 3.3A, pp. 47 to 55	Yes	
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource or tribal cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	Appendix 3.3A, Appendix C	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: William Larson/Cameron Travis

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Confidential Appendix 3.3B	Yes	
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible for literature searches, surveys, and preparation of the technical report.	Appendix 3.3A, p. 23	No	See DR CUL/TRI-6
Appendix B (g) (2) (D) (i)	A copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC.	Appendix 3.3B (Confidential)	No	See DR CUL/TRI-7
Appendix B (g) (2) (D) (ii)	A copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.	Appendix 3.3B (Confidential)	No	See DR CUL/TRI-8
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	Appendix 3.3B (Confidential)	No	See DR CUL/TRI-8

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: William Larson/Cameron Travis

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	--	--	--
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	Subsection 3.3.6, pp. 3.3-14 to 3.3-15	Yes	
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural and tribal cultural resources and any unanticipated impacts to known cultural or tribal cultural resources; and	Subsection 3.3.6, pp. 3.3-14 to 3.3-15	Yes	
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.	Subsection 3.3.6, pp. 3.3-14 to 3.3-15; Appendix 1G	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.3.7, pp. 3.3-15 to 3.3-20	No	See DR CUL/TRI-9
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce	Subsection 3.3.8, p. 3.3-20	No	See DR CUL/TRI-10

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Cultural Resources and Tribal Cultural Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: William Larson/Cameron Travis

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Gabriel Roark

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.3.8, p. 3.3-20	No	See DR CUL/TRI-11
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.3.8, p. 3.3-20	No	See DR CUL/TRI-12

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Efficiency, Energy and Energy Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ardalan Raisi Sofi Shahab Khoshmashrab

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior:

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	N/A	N/A	N/A
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	N/A	N/A	N/A
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	N/A	N/A	N/A
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	Section 2.4, p. 2-18	Yes	
Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Efficiency, Energy and Energy Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ardalan Raisi Sofi

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	with applicable efficiency and operating standards.			
Appendix B (h) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	Subsection 4.5.2, pp. 4-5 and 4-6	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Efficiency, Energy and Energy Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ardalan Raisi Sofi

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Executive Summary** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ann Crisp

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Table of Contents pp. TOC-i to TOC-xii	No	See DR ES-1
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics.	Subsection 1.3, pp. 1-2 to 1.6, Section 3.1, p. 3.1-18	Yes	
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county, and assessor's parcel numbers.	Subsection 1.2, p. 1-2	Yes	
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	Subsection 1.2, p. 1-2; Section 2, Figures 2-1 to 2-3	Yes	
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	Section 2, Figure 2-5, Section	No	See DR ES-2
Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels	Appendix 1B, p. 1; Appendix 1A, Figure Appendix 1A	No	See DR ES-3

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Executive Summary** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ann Crisp

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities. Provide the direct mailing addresses for the owners and occupants of properties contiguous to the proposed power plant, related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. Provide a map showing the parcels in the notice area.			
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	Subsection 1.5, p. 1-6	Yes	
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	Subsection 1.6, pp. 1-6 to 1-7	Yes	
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	Subsection 1.6, pp. 1-6 to 1-7	Yes	
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in (a)(3)(A) and (B).	Section 1.6, pp. 1-6 to 1-7	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ____ Revision No. 0 Date: September 2024

Technical Area: **Facility Design** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ken Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (1) (A)	A description of the site conditions and investigations or studies conducted to determine the site conditions used as the basis for developing design criteria. The descriptions shall include, but not be limited to, seismic and other geologic hazards, adverse conditions that could affect the project's foundation, adverse meteorological and climatic conditions, and flooding hazards, if applicable.	Subsection 2.1.1, p. 2-1; Section 3.4, Subsection 3.4.1.1 to 3.4.1.3.4, pp. 3.4-1 to 3.4-4	Yes	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Subsection 2.3.3 to 2.3.4, pp. 2-13 to 2-14	Yes	
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation), analytical techniques, assumptions, loading conditions, and loading combinations to be used in the design of facility structures and major mechanical and electrical equipment.	Subsection 2.3.5 to 2.3.7, pp. 2-14 to 2-16	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ____ Revision No. 0 Date: September 2024

Technical Area: **Facility Design** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ken Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (1) (D)	For each of the following facilities or systems, provide a description including drawings, dimensions, surface-area requirements, typical operating data, and performance and design criteria for protection from impacts due to adverse site conditions:	Subsection 2.6, pp. 2-19 to 2-32, Figures 2-1 to 2-6	Yes	
Appendix B (h) (1) (D) (i)	The power generation system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (ii)	The heat dissipation system;	Subsection 2.1.3.1, pp. 2-3 to 2-4	Yes	
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	N/A	N/A	N/A
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Subsection 2.3.11 to 2.3-13, p. 2-17; Subsection 2.4.1 to 2.4.3, pp. 2-18 to 2-19	Yes	
Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	Subsection 3.7, pp. 3-7-1 to 3.7-22	Yes	
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	N/A	N/A	N/A
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	Subsection 2.2, pp. 2-7 to 2-10	Yes	
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	Subsection 2.1.3, p. 2-2; Subsection 2.1.3.10, p. 2-7	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and	N/A	N/A	N/A

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Technical Area: **Facility Design** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ken Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Geological Hazards** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.4 p. 3.4-1; Subsection 3.4.1 pp. 3.4-1 to 3.4-4; Subsection 3.4.3, pp. 3.4-5 to 3.4-7; Subsection 3.4.4 pp. 3.4-7 to 3.4-8	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.4.1.2, pp. 3.4-1 to 3.4-2; Subsection 3.4.1.3, pp. 3.4-2 to 3.4-3	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.4.9, pp. 3.4-14 to 3.4-16	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of	Subsection 3.4.1, pp. 3.4-1 to 3.4-4; Subsection 3.4.3, pp. 3.4-5 to 3.4-7; Subsection 3.4.4, pp. 3.4-7 to 3.4-8; Subsection 3.4.6.2, pp. 3.4-10 to 3.4-11; Subsection 3.4.6.3, pp. 3.4-11 to 3.4-13	Yes	

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Technical Area: **Geological Hazards** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	Subsection 3.4.1.1 p. 3.4-1; Subsection 3.4.1.2 pp. 3.4-1 to 3.4-2; Subsection 3.4.1.3 pp. 3.4-2 to 3.4-3; Subsection 3.4.1.4 p. 3.4-4; Figure 3.4-2, p. 3.4-19	No	See DR GEO-2
Appendix B (g) (17) (B)	A map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. Include an analysis of the likelihood of ground rupture, seismic shaking, mass wasting and slope stability, liquefaction, subsidence, tsunami runup, and expansion or collapse	Figure 3.4-1 p. 3.4-17; Subsection 3.4.3.3, pp. 3.4-5 to 3.4-7	No	See DR GEO-1

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Technical Area: **Geological Hazards** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of soil structures at the plant site. Describe known geologic hazards along or crossing linear facilities.			
Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.	Subsection 3.4.1.4 p. 3.4-4; Table 3.4.3, p. 3.4-14	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.4.6, pp. 3.4-8 to 3.4-13; Table 3.4.2 pp. 3.4-8 to 3.4-9	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and	Subsection 3.4.7, p. 3.4-13; Table 3.4.3, p. 3.4-14.	Yes	

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Technical Area: **Geological Hazards** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.4.7, p. 3.4-13; Table 3.4.3, p. 3.4-14	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.4.8, p. 3.4-14	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Hazardous Materials Handling** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Paul Miller (RCH)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.5.3.1, p. 3.5-7	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.14.1.1, p. 3.14-1; Subsection 3.5.3.3, pp. 3.5-12 to 3.5-13	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.5, p. 3.5-1; Subsection 3.5.8, pp. 3.5-21 to 3.5-22	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials	Subsection 3.5.1 pp. 3.5-1 to 3.5-3; Subsection 3.5.3 pp. 3.5-7 to 3.5-15	No	See DR HAZ-1 and DR HAZ-2

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Hazardous Materials Handling** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Paul Miller (RCH)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.	Subsection 3.5.1.2.2, pp. 3.5-5 to 3.5-7, Table 3.5-2	No	See DR HAZ-3
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	Section 3.5, p. 3.5-23, Figure 3.5.1	No	See DR HAZ-4
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Subsection 3.5.1.2, p. 3.5-3 to 3.5-7	Yes	
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases that could result in off site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the application is complete.	Subsection 3.5.3.3, p. 3.5-11 to 3.5-12	Yes	
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) will be required,	Subsection 3.5.3.3, p. 3.5-11	Yes	

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Technical Area: **Hazardous Materials Handling** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Paul Miller (RCH)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and if so, the requirements that will likely be incorporated into the plan.			
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Subsection 3.5.3.3, pp. 3.5-9 to 3.5-13	Yes	
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	Subsection 3.5.3.3, pp. 3.5-11 to 3.5-12	No	See DR HAZ-5 and DR HAZ-6
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 3.5.6, pp. 3.5-15 to 3.5-17, Table 3.5-3	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 3.5.7, p. 3.5-21, Table 3.5-4	Yes	

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Technical Area: **Hazardous Materials Handling** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Paul Miller (RCH)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 3.5.7, p. 3.5-21	No	See DR HAZ-7
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.5.7, p. 3.5-21	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Land Use** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.6.3.1, p. 3.6-3; Appendix 3.5A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.6.3.1, p. 3.6-3; Appendix 3.5A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.6.9, p. 3.6-20; Appendix 3.5A	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any	Subsection 2.1.1, p. 2-1; Subsection 3.6.1.2, pp. 3.6-1 to 3.6-2; Subsection 3.6.1.3, p. 3.6-2; Appendix 3.5A; Subsection 3.6.3.3, pp. 3.6-3 to 3.6-14; Subsection 3.6.4, p. 3.6-14; Subsection 3.6.5, p. 3.6-14	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Land Use** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (3) (A)	A discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	Subsection 2.1.1, p. 2-1; Subsection 3.6.1.2, pp. 3.6-1 to 3.6-2; Subsection 3.6.1.3, p. 3.6-2; Appendix 3.5A; Subsection 3.6.3.3, pp. 3.6-3 to 3.6-14	Yes	
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	Subsection 2.1.1, p. 2-1; Subsection 3.6.1.2, pp. 3.6-1 to 3.6-2; Subsection 3.6.1.3, p. 3.6-2; Appendix 3.5A	Yes	

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Land Use** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (3) (A) (ii)	A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level;	Subsection 3.6.3.3, pp. 3.6-11 to 3.6-12	Yes	
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	Subsection 1.7, p. 1-7; Subsection 3.6.3.3, p. 3.6-12	Yes	
Appendix B (g) (3) (A) (iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.	Section 3.6, Figures 3.6-1 to 3.6-5, pp. 3.6-21 to 3.6-29	Yes	
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state,	Subsection 1.7, p. 1-7; Subsection 3.6.3.3, pp. 3.6-3 to 3.6-14	Yes	

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Technical Area: **Land Use** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations.			
Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be located on a single	Subsection 1.2, p. 1-2	Yes	

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Technical Area: **Land Use** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	legal parcel. The merger need not occur prior to a decision on the Application but must be completed prior to the start of construction.			
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	Section 3.6, Figure 3.6-5, p. 3.6-29	Yes	
Appendix B (g) (3) (D) (i)	Land classifications as shown on the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland maps, crop types, irrigation systems, and any special cultivation practices;	Subsection 3.6.1.4, pp. 3.6-2 to 3.6-3; Subsection 3.6.3.3, pp. 3.6-3 to 3.6-14	Yes	
Appendix B (g) (3) (D) (ii)	Whether agricultural land affected by the project was historically classified Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and		No	See DR LAND-1
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses.	Appendix 3.6A; Subsection 3.6.3.3, pp. 3.6-3 to 3.6-14	No	See DR LAND-2, DR LAND-3, DR LAND-4, DR LAND-5, DR LAND-6, and DR LAND-7

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Technical Area: **Land Use** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 3.6, Table 3.6-1, pp. 3.6-4 to 3.6-10; Subsection 3.6.3.3, pp. 3.6-3 to 3.6-14; Section 3.6, Table 3.6-2, pp. 3.6-15 to 3.6-16	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and	Section 3.6, Table 3.6-3, p. 3.6-19	Yes	

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Technical Area: **Land Use** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 3.6, Table 3.6-3, p. 3.6-19	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.6.8, p. 3.6-19	Yes	

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Technical Area: **Noise** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Kenneth Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.7.1, pp. 3.7-1 to 3.7-4	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.7.1, pp. 3.7-1 to 3.7-4	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.7.9, p. 3.7-22	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the	Subsection 3.7.1.9 to 3.7.4, pp. 3.7-4 to 3.7-16	Yes	

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Technical Area: **Noise** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Kenneth Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (4) (A)	A land use map which identifies residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either construction or operation, there is a potential increase of 5 dB(A) or more, over existing background levels.	Subsection 3.6.5, p. 3.6-29, Figure 3.6-5; Appendix 3.7A, Figure 3, p. 20	Yes	
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature,	Subsection 3.7.1.10, p. 3.7-5 to 3.7-7	No	See DR NOISE-1 and DR NOISE-2

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Technical Area: **Noise** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Kenneth Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L_{10}, L_{50}, and L_{90} values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) shall also be reported in units of dB(A).			
Appendix B (g) (4) (C)	A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.	Appendix 3.7A, Table 4, p. 23; Table 6, p. 25; Table 7, p. 27	Yes	
Appendix B (g) (4) (D)	An estimate of the project noise levels, during both construction	Appendix 3.7A, Figure 4, p. 30	Yes	

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Technical Area: **Noise** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Kenneth Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and operation, at residences, hospitals, libraries, schools, places of worship or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.			
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	Appendix 3.7A, Table 4 and 6, p. 23 and p. 25; Appendix 3.7A, Figure 4, p. 30	Yes	
Appendix B (g) (4) (F)	The audible noise from existing switchyards and overhead transmission lines that would be affected by the project and estimates of the future audible noise levels that would result from existing and proposed switchyards and transmission lines. Noise levels shall be calculated at the property boundary for switchyards and at the edge of the rights-of-way for transmission lines.	Appendix 3.7A, Exhibit A and B, pp. 17 and 18	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a	Subsection 3.7.6, p. 3.7	Yes	

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Technical Area: **Noise** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Kenneth Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.7.6, p. 3.7	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of	N./A	N/A	N/A

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Technical Area: **Noise** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Kenneth Salyphone

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.			

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Paleontological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.8.3, pp. 3.8-4 to 3.8-5; 3.8.4 p. 3.8-5.	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.8.3.1, p. 3.8-4	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.8.7, pp. 3.8-8 to 3.8-9	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference	Section 3.8 p. 3.8-1; Subsection 3.8.1 pp. 3.8-1 to 3.8-2; Subsection 3.8.2 pp. 3.8-2 to 3.8-4; Table 3.8-1 p. 3.8-3; Subsection 3.8.3 pp. 3.8-4 to 3.8-5; 3.8.4 p. 3.8-5; Subsection 3.8.5 pp. 3.8-5 to 3.8-6	Yes	

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Technical Area: **Paleontological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting, formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.	Subsection 3.8.1, pp. 3.8-1 to 3.8-2	Yes	
Appendix B (g) (16) (B)	A discussion of the sensitivity of the project area described in subsection (g)(16)(A) and the presence and significance of any known paleontological localities or other paleontological resources within or adjacent to the project. Include a discussion of sensitivity for each geologic unit identified on the most recent geologic map at a scale of 1:24,000. Provide rationale as to why the sensitivity was assigned.	Subsection 3.8.1.1.1 p. 3.8-2; Figure 3.4-1 p. 3.4-17	No	DR PALEO-1
Appendix B (g) (16) (C)	A summary of all local museums, literature searches and field surveys used to provide information about paleontological resources in the project area described in (g)(16)(A). Identify the dates of the surveys, methods used in completing the surveys, and the names	Subsection 3.8.3.1.1, p. 3.8-4; Section 3.8.3.1.2, p. 3.8-4; Appendix 3.8B (Confidential)	Yes	

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Technical Area: **Paleontological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and qualifications of the individuals conducting the surveys.			
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey reports, locality records, and maps at a scale of 1:24,000, showing occurrences of fossil finds, if known, within a 1-mile radius of the project and related facilities shall be included in a separate appendix to the Application and submitted to the Commission under a request for confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.	Appendix 3.8B (Confidential)	Yes	
Appendix B (g) (16) (E)	A discussion of any educational programs proposed to enhance awareness of potential impacts to paleontological resources by employees, measures proposed for mitigation of impacts to known palaeontologic resources, and a set of contingency measures for mitigation of potential impacts to unknown paleontological resources.	Section 3.8.5, pp. 3.8-5 to 3.8-6	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance	Subsection 3.8.6, pp. 3.8-6 to 3.8-8, Table 3.8.2, p. 3.8-6	Yes	

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Technical Area: **Paleontological Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.8.6, p. 3.8-6; Table 3.8.2 p. 3.8-6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.8.7, p. 3.8-8; Table 3.8.3, p. 3.8-9	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.8.8, p. 3.8-8	Yes	

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Project: Potentia-Viridi

Technical Area: **Project Description** Battery Energy Storage System Technical Staff: Ann Crisp

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide:	-	--	--
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	Subsection 2.1.2, Figure 2-1 and 2-4; Appendix 1A, Figure Appendix 1A	No	See DR PD-1
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities to establish the accuracy of the photo simulations required in sections (a)(1)(D) and (g)(6)(F);	Subsection 2.4, Figure 2-4; Appendix 2A, Appendix 2B (Confidential)	No	See DR PD-2 and DR VIS-6
Appendix B (b) (1) (C)	A detailed description of the design, methods of construction (include depth of excavations and other ground disturbances) and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	Subsection 2.1, p. 2-1; Subsection 2.1.3, pp. 2-2 to 2.7, Subsection 2.1.3, Tables 2-1 and 2-2, p. 2-3; Subsection 2.4, p. 2-18 to 2-19	No	See DR PD-3

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Project: Potentia-Viridi

Technical Area: **Project Description** Battery Energy Storage System Technical Staff: Ann Crisp

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected, and the consideration given to engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and other factors considered by the applicant.	Section 2.6, p. 2-19; Subsection 4.3, p. 4-2 to 4.3	Yes	
Appendix B (b) (2)	In a section titled, "Transmission Lines Description, Design, and Operation" provide:	--	--	--
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	Subsection 1.3; Subsection 2.2, Figure 2-4 and Figure 2.6	No	See DR PD-3
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.	Section 3.13, Figures 3.13-3A to 3.13-3C, Section 3.13, Figures 3.13-4A to 3.13-4C	Yes	
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or	Section 2.2, pp. 2-7 to 2-10, Section 2.2, Tables 2-3 and 2-4, pp. 2-8 to 2-9, Figure 2.6	Yes	

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Technical Area: **Project Description** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ann Crisp

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.			
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints; and	Section 2.2, p. 2-7	Yes	
Appendix B (b) (2) (E)	A completed System Impact Study or signed System Impact Study Agreement with the California Independent System Operator and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact Study agreement and proof of payment to the interconnecting utility. If the interconnection and operation of the proposed project will likely impact a transmission system that is not	Appendix 2D	Yes	

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Technical Area: **Project Description** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ann Crisp

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when applicable) with/to the impacted transmission owner or provide evidence that there are no system impacts requiring mitigation.			
Appendix B (b) (3)	Applications for geothermal facilities shall contain the following additional information:	N/A	N/A	N/A
Appendix B (b) (3) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) showing the location of the geothermal leaseholds, along with a description by section, township, range, county, and assessor's parcel numbers of the leaseholds;	N/A	N/A	N/A
Appendix B (b) (3) (B)	Full-page color photographic reproductions of the geothermal leaseholds;	N/A	N/A	N/A
Appendix B (b) (3) (C)	A description of the process by which the geothermal leasehold was selected and the consideration given to engineering constraints, site geology, environmental impacts, water, steam, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant. Include references to any environmental	N/A	N/A	N/A

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Technical Area: **Project Description** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ann Crisp

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	documents which address steam field development;			
Appendix B (b) (3) (D)	A detailed description of the type, quality, and characteristics of the geothermal resource, including pressure and temperature flow rates, constituents and concentrations of non-condensable gases, and constituent concentrations of dissolved solids, and descriptions and concentrations of any substances potentially harmful to public health and safety or to the environment;	N/A	N/A	N/A
Appendix B (b) (3) (E)	Proposed locations of production and re-injection wells for the project. Include the applicant's assessment of geothermal resource adequacy, including the production history of those wells within the leaseholds dedicated to the project, including pressure decline curves as available; and	N/A	N/A	N/A
Appendix B (b) (3) (F)	A discussion of the potential impacts on the temperature, mineral content, and rate of flow of thermal springs affected by the project.	N/A	N/A	N/A
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Section 2.5, p. 2-19, Appendix 2C, Section 6, pp. 12 to 13	No	See DR PD-4

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Technical Area: **Public Health** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.9.1, p. 3.9-2, Subsection 3.9.2, pp. 3.9-3 to 3.9-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 2.3.1, Table 2-5, pp. 2-10 to 2-11, Subsection 2.3.2, Table 2-6, pp. 2-11 to 2-13; Subsection 3.9.1, p. 3.9-2, Subsection 3.9.2, pp. 3.9-3 to 3.9-6	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.9.6, p. 3.9-10	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness	Subsection 3.9.1, Subsection 3.9.2, Subsection 3.9.3, pp. 3.9-1 to 3.9-6; Appendix 3.1B	No	See DR PH-1, DR PH-2, and DR PH-10

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Public Health** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	Subsection 3.9.2, pp. 3.9-4 to 3.9-5, Table 3.9-2, Table 3.9-3; Appendix 3.1B	No	See DR PH-2, DR PH-4, DR PH-5, DR PH-8, and DR PH-9

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Public Health** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.	Subsection 3.9.2.2, Table 3.9-1, p. 3.9-4; Appendix 3.1B	No	See DR PH-3 and DR PH-5
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.	Subsection 3.9- 1, p. 3.9-1	Yes	
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	Subsection 3.9.2, p. 3.9-3	No	See DR PH-1
Appendix B (g) (9) (E)	For this section, the following definitions apply:	--	--	--
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;	Subsection 3.9.1, p. 3.9-2, Subsection 3.9.2, p. 3.9-3	No	See DR PH-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Public Health** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and	N/A	N/A	N/A
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.	Subsection 3.9.1, p. 3.9-2, Subsection 3.9-2, pp. 3.9-3 to 3.9-5, Tables 3.9-2, 3.9-3	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.9.5, pp. 3.9-8 to 3.9-10	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state	Section 3.1, Subsection 3.1.5, pp. 3.1-29	No	See DR PH-6

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Public Health** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Winston Potts/Tao Jiang

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 3.1, Subsection 3.1.6, pp. 3.1-29	No	See DR PH-7
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.1.7, pp. 3.1-29	No	See DR AQ-4 and DR AQ-5

DATA COMPLETNESS WORKSHEET

Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Reliability** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ardalan Raisi Sofi

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (3) (A)	A discussion of the sources and availability of the fuel or fuels to be used over the estimated service life of the facilities.	Section 3.1, Subsection 3.1.3.2.2, p. 3.1-17	Yes	
Appendix B (h) (3) (B)	A discussion of the anticipated service life and degree of reliability expected to be	Section 2.4, p. 2-18; Appendix 3.2E, p. 19	Yes	

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Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Reliability** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ardalan Raisi Sofi

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	achieved by the proposed facilities on consideration of:			
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	Section 2.4, pp. 2-17 to 2-18	Yes	
Appendix B (h) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;	Section 1.3, pp. 1-2 to 1-6	Yes	
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	Subsection 3.4.1, pp. 3.4-1 to 3.4-6; Subsection 3.15.1.1, p. 3.15-1; Subsection 3.15.1.4, p. 3.15-7	Yes	
Appendix B (h) (3) (B) (iv)	Special design features adopted by the applicant or resource supplier to ensure power plant reliability including equipment redundancy; and	Section 2.4, p. 2-18; Appendix 1F, pp. 3 to 4	Yes	

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Technical Area: **Reliability** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ardalan Raisi Sofi

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	N/A	N/A	N/A
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have	N/A	N/A	N/A

DATA COMPLETNESS WORKSHEET

Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Reliability** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ardalan Raisi Sofi

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Socioeconomics** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ellen LeFevre

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.10.3.1, p. 3.10-14; Subsection 3.10.2.2, p. 3.10-14; Subsection 3.10.2.3, p. 3.10-15; Appendix 3.10A (Confidential), pp. 25 to 26, 30 to 31, 33, and 40	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.10.1.1, p. 3.10-2; Appendix 3.10A (Confidential) pp. 25 to 26	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to	Subsection 3.10.1, p. 3.10-1; Subsection 3.10.4, pp. 3.10-19 to 3.10-20; Subsection 3.10.2.3, pp. 3.10-15 to 3.10-19; Subsection 3.10.5, p. 3.10-20	Yes	

DATA COMPLETENESS WORKSHEET

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Technical Area: **Socioeconomics** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ellen LeFevre

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region affected by construction and operation of the project. Include:	Appendix 3.10A (Confidential), Chapter 2, pp. 6 to 15	Yes	
Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;	Subsection 3.10.1.3, Table 3.0-6 and Table 3.10-7, pp. 3.10-6 to 3.10-7; Subsection 3.10.1.4, p. 3.10-8	Yes	
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	Subsection 3.10.1.1, Tables 3.10-1, 3.10-2, and 3.10-3, pp. 3.10-2 to 3.10-4; Appendix 3.10A (Confidential), p. 8 to 9, and 13 to 15	Yes	
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	Subsection 3.10.1.3, Table 3.10-8, p. 3.10-7	No	See DR SOCIO-1
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for	Appendix 3.10A (Confidential), Table A-4, p. 45	Yes	

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Technical Area: **Socioeconomics** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ellen LeFevre

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	construction and operation of the project;			
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	Subsection 3.10.1.2, Table 3.10-4, pp. 3.10-4 to 3.10-5	Yes	
Appendix B (g) (7) (A) (vi)	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. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule.	Subsection 3.10.1.6.1, p. 3.10-10; Subsection 3.10.1.6.2, p. 3.10-10 to 3.10-11; Subsection 3.10.1.6.4, p. 3.10-12 to 3.10-13	No	See DR SOCIO-2
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note year of estimate, model, if used, and appropriate sources), including:	Appendix 3.10A (Confidential), Chapter 3, pp. 26 to 33	Yes	

DATA COMPLETENESS WORKSHEET

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Technical Area: **Socioeconomics** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ellen LeFevre

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number of permanent operations workers during a year;	Subsection 3.10.2.3, p. 3.10-15; Appendix 3.10A (Confidential), Subsection 3.2, Table 3-3 and 3-4, pp. 28 to 29	Yes	
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work during the project construction and operation;	Subsection 3.10.2.3.4, pp. 3.10-16 to 3.1-17; Appendix 3.10A (Confidential), Table A-9, pg. 47, and Table 3-5 p. 34.	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	Appendix 3.10A (Confidential), pp. 34 to 35	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	Appendix 3.10A (Confidential), Subsection 3.4.2, p. 34	Yes	
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection,	Subsection 3.10.1.6.1, p. 3.10-10; Subsection 3.10.2.3, pp. 3.10-18 to 3.10-19; Subsection 3.10.1.6.2, p. 3.10-10; Subsection 3.10.1.7, pp. 3.10-13; Subsection 3.10.1.6.3, p. 3.10-11; Subsection 3.10.1.6.4, p. 3.10-12; Subsection 3.10.1.5, p. 3.10-9	No	See DR SOCIO-3

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Technical Area: **Socioeconomics** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ellen LeFevre

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school district during the construction and operating -phases;			
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	Appendix 3.10A (Confidential), Subsection 2.5, p. 19	Yes	
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	Subsection 3.10.2.3, p. 3.10-16 to 3.10-17	Yes	
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	Appendix 3.10A (Confidential), Table 8-A, p. 48, and Table 3-7, p. 32	Yes	
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	Appendix 3.10A (Confidential), p. 31	Yes	
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and	Appendix 3.10A (Confidential), p. 37, Tables A-10 and A-11, p. 50	Yes	

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Technical Area: **Socioeconomics** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ellen LeFevre

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	separately during an operational year of the project;			
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	Appendix 3.10A (Confidential), Subsection 3.3.1, Table 3-7 p. 32	Yes	
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment effects due to construction and operation of the project; and	Subsection 3.10.2.3, pp. 3.10-16 to 3.10-17	Yes	
Appendix B (g) (7) (B) (xiii)	A discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations.	Subsection 3.10.2.4, p. 3.10-19	No	See DR SOCIO-4
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.10.6, Table 3.10-16, pp. 3.10-21 to 3.10-22	Yes	

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Technical Area: **Socioeconomics** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Ellen LeFevre

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.10-6, Table 3.10-16, pp. 3.10-21 to 3.10-22; Subsection 3.10.8, p. 3.10-23	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.10.7, Table 3.10-17, p. 3.10-23; Appendix 3.10A (Confidential), Table 3.6, p. 41	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Soils** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Karim Abulaban/Steve Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Appendix 3.4A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Appendix 3.2A; Appendix 3.4A; Appendix 3.5A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Appendix 3.4A; Appendix 2A; Appendix 3.5A; Appendix 3.2A	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the	Subsection 3.11.1, pp. 3.11-1 to 3.11-3; Subsection 3.11.3, pp. 3.11-4 to 3.11-6; Subsection 3.11.4, pp. 3.11-6 to 3.11-7; Subsection 3.11.5, p. 3.11-7	Yes	

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Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Soils** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Karim Abulaban/Steve Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (15) (A)	A map at a scale of 1:24,000 and written description of soil types and all agricultural land uses that will be affected by the proposed project. The description shall include:	Subsection 3.11.1.1, pp. 3.11-1 to 3.11-2; Figure 3.11-1, p. 3.11-13	Yes	
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;	Subsection 3.11.1.1, pp. 3.11-1 to 3.11-2; Subsection 3.11.1.2, p. 3.11-2	Yes	
Appendix B (g) (15) (A) (ii)	An identification of other physical and chemical characteristics of the soil necessary to allow an evaluation of soil erodibility, permeability, re-vegetation	Subsection 3.11.1.3, pp. 3.11-2 to 3.11-3	Yes	

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Technical Area: **Soils** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Karim Abulaban/Steve Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	potential, and cycling of pollutants in the soil-vegetation system;			
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and	Subsection 3.11.3.3, Impact 3.11-1, pp. 3.11-4 to 3.11-5.	Yes	
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	Subsection 3.11.1.3.5, p. 3.11-3.	Yes	
Appendix B (g) (15) (B)	An assessment of the effects of the proposed project on soil resources and agricultural land uses. This discussion shall include:	Subsection 3.11.3.3, pp. 3.11-4 to 3.11-6	Yes	
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and	Section 3.11.1.2, p. 3.11-2; Section 3.11.3.3, pp. 3.11-4 to 3.11-6	Yes	
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.	Section 3.1, pp. 3.1 - 3.10; Subsection 3.1.4, pp. 3.1-18 to 3.1-27;	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability	Subsection 3.11.6, pp. 3.11-7 to 3.11-10	Yes	

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Technical Area: **Soils** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Karim Abulaban/Steve Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.11.7, p. 3.11-7	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a	Subsection 3.11.7, p. 3.11-10	Yes	

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Completeness: Complete **X** Incomplete ___ Revision No. 0 Date: September 2024

Technical Area: **Soils** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Andrea Koch

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Karim Abulaban/Steve Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.11.8, p. 3.11-10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Bill Burton

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.12.3.1, p. 3.12-4; Subsection 3.12.3.2, pp. 3.12-4 to 3.12-5; Appendix 3.12A, pp. 17 to 19; Appendix 3.12A, p. 40	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.12.3.1, p. 3.12-4; Subsection 3.12.3.2, pp. 3.12-4 to 3.12-5; Appendix 3.12A, pp. 17 to 19; Appendix 3.12A, p. 40	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.12.9, pp. 3.12-24 to 3.12-25; Appendix 3.12A, p.42	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to	Section 3.12, pp. 3.12-1 to 3.12-25	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Bill Burton

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	Appendix 3.12A, Figure 1	Yes	
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Bill Burton

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include:			
Appendix B (g) (5) (B) (i)	A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities.	N/A	N/A	N/A
Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	N/A	N/A	N/A
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and	N/A	N/A	N/A
Appendix B (g) (5) (B) (iv)	Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.	N/A	N/A	N/A
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	Subsection 3.12.3.3, pp. 3.12-9 to 3.12-10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Bill Burton

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	Subsection 3.12.3.3, pp. 3.12-9 to 3.12-10	Yes	
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	Subsection 3.12.3.3, pp. 3.12-9 to 3.12-10	Yes	
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	N/A	N/A	N/A
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	N/A	N/A	N/A
Appendix B (g) (5) (D)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	Subsection 3.12.1, pp. 3.12-1 to 3.12-3; Appendix 3.12A, pp. 6 to 9	Yes	
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	Subsection 3.12.1.1, pp. 3.12-1 to 3.12-2; Appendix 3.12A, p. 6; Appendix 3.12A, Figure 3	Yes	
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	Appendix 3.12, Table 4; Appendix 3.12A, Figure 10; Appendix 3.12A, Appendix A	Yes	

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Bill Burton

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	Subsection 3.12.3.3, Table 3.12-1; Subsection 3.12.4, Table 3.12-3	Yes	
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	Subsection 3.12.1.6, pp: 3.12-3 to 3.12-4	Yes	
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and	Subsection 3.12.3.3, Table 3.12-2; Appendix 3.12A, Table 4	Yes	
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.	Subsection 3.12.3.3, pp. 3.12-10 to 3.12-11, Subsection 3.12.4, pp. 3.12-12 to 3.12-15	No	See DR TRANS-1
Appendix B (g) (5) (E)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include:	Section 3.12, pp. 3.12-1 to 3.12-25	Yes	
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.	Section 3.12	No	See DR TRANS-2

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Bill Burton

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (5) (E) (ii)	Description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities.	Subsection 3.12.3.3, pp. 3.12-10 to 3.12-11, Appendix 3.12A, Figure 2	No	See DR TRANS-3
Appendix B (g) (5) (F)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.	Subsection 3.12.3.3, p. 3.12-11	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction	Subsection 3.12.6, Table 3.12-5. p. 3.12-16	Yes	

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Bill Burton

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.12.7, Table 3.12-6, 3.12-23	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.12.7, Table 3.12-6, p. 3.12-23	No	See DR TRANS-4
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.12.8, Table 3.12-7, p. 3.12-24	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Transmission System Safety and Nuisance** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Sudath Edirisuriya

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials	Section 2, pp. 2-1 to 2-10	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Transmission System Safety and Nuisance** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Sudath Edirisuriya

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	Section 2, pp. 2-1 to 2-10	Yes	
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.	Section 2, pp. 2.-1 to 2-10; Appendix 2B (Confidential), pp. 4-21	No	See DR-TSSN-1, DR-TSSN-2 and DR-TSSN-3
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.	Section 2, pp. 2-1 to 10; Appendix 2B (Confidential), pp. 4-21	No	See DR-TSSN-4
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to thex but could proposed project, and a	Section 2, pp. 2-1 to 2-10	No	See DR-TSSN-5

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Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Transmission System Safety and Nuisance** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Sudath Edirisuriya

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Transmission System Design** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Sudath Edirisuriya

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (h) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	Section 2, pp. 2-1 to 2-10; Appendix 2B (Confidential), pp. 4-21	Yes	

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Transmission System Design** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Sudath Edirisuriya

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (h) (2) (B)	A discussion of the extent to which the proposed electric transmission facilities have been designed, planned, and routed to meet the transmission requirements created by additional generating facilities planned by the applicant or any other entity.	Section 2, pp. 2-1 to 2-10; Appendix 2B (Confidential), pp. 4-21	No	See TSD-1 and DR TSD-2
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	Section 2, pp. 2-1 to 2-10, Appendix 2B (Confidential), pp. 4-21	No	See DRTSD-3
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints.	Section 2, pp. 2-1 to 2-10; Appendix 2B (Confidential), pp. 4-21	Yes	

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Transmission System Design** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Sudath Edirisuriya

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (2) (E)	A completed System Impact Study or signed System Impact Study Agreement with the California Independent System Operator and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact Study agreement and proof of payment to the interconnecting utility. If the interconnection and operation of the proposed project will likely impact an transmission system that is not controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when applicable) with/to the impacted transmission owner or provide evidence that there are no system impacts requiring mitigation.	Transmission and Interconnection Study (Confidential)	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance	Section 2, pp. 21 to 2-10	No	See DR TSD-4 and DR TSD-5

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Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Transmission System Design** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Sudath Edirisuriya

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 2, pp. 2-1 to 2-10	No	See TSD-6
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

Completeness: Complete ___ Incomplete **X** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Visual Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Michael Clayton (MCA)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.13.3.1, pp. 3.13-5 to 3.13-7; Subsection 3.13.3.2, pp. 3.13-7 to 3.13-9; Subsection 3.13.3.3, pp. 3.13-9 to 3.13-10; Subsection 3.13.3.5, pp. 3.13-11 to 3.13-16; Subsection 3.13.4, pp. 3.13-16 to 3.13-17	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.13.3.1, pp. 3.13-5 to 3.13-7; Subsection 3.13.3.2, pp. 3.13-7 to 3.13-9; Subsection 3.13.3.3, pp. 3.13-9 to 3.13-10; Subsection 3.13.3.5, pp. 3.13-11 to 3.13-16; Subsection 3.13.4, pp. 3.13-16 to 3.13-17	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.13.9, pp. 3.13-32 to 3.13-33	Yes	
Appendix B (g) (1)	... provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation, and	Subsection 3.13.1.2, pp. 3.13-2 to 3.13-5; Subsection 3.13.3.3, pp. 3.13-9 to 3.13-10; Subsection 3.13.3.5, pp.	No	See DR VIS-1, DR VIS-2, and DR VIS-8

Completeness: Complete ___ Incomplete X **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Visual Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Michael Clayton (MCA)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection (or a combination of) used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	3.13-11 to 3.13-16; Subsection 3.13.4, pp. 3.16-16 to 3.16-17; Subsection 3.13.5, p. 3.13-17; Subsection 3.2, pp. 3-2 to 3-7		
Appendix B (g) (6) (A)	Provide a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity, and along the proposed routes for any aboveground project-related linear facilities. Include:	Subsection 3.13.1, pp. 3.13-1 to 3.13-5	Yes	
Appendix B (g) (6) (A) (i)	Show on a map(s) (pinpoint) any designated or recognized scenic vista and scenic resource within a five-mile radius of the project and one-mile radius of a project-related linear facility. Include:	Subsection 3.13.1.2, p. 3.13-2; Figure 3.13-1, p. 3.13-35	Yes	

Completeness: Complete ___ Incomplete **X** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Visual Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Michael Clayton (MCA)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (6) (A) (i) a.	Any designated scenic vista and scenic resource in an adopted federal, state, county, or city government planning document, plan, or regulation.	Subsection 3.13.1.2, pp. 3.13-2 to 3.13-4	Yes	
Appendix B (g) (6) (A) (i) b.	A natural feature or object that is a part of the land, such as a geologic distinguishing characteristic (e.g., laccolith), geomorphologic feature (e.g., gorge), or other terrain feature (e.g., a water body, open space, or a tree recognized for its aesthetic, botanical and ecological value, or age, rarity, and size).	Subsection 3.13.1.2, pp. 3.13-2 to 3.13-4	No	See DR VIS-3
Appendix B (g) (6) (A) (i) c.	A man-made feature or object that embodies elements of architecture or engineering design, detail, materials or craftsmanship that represent a significant innovation or is unique, such as the California State Capitol, Golden Gate Bridge, or Hollywood Sign.	Subsection 3.13.1.2, pp. 3.13-2 to 3.13-4	Yes	
Appendix B (g) (6) (A) (i) d.	Explain does the project eliminate or obstruct the public view (the visible area from a location where the public has a legal and physical right of access to real property) of a scenic vista and scenic	Subsection 3.13.1.2, pp. 3.13-2 to 3.13-5; Subsection 3.13.3.5, pp. 3.13-11 to 3.13-16	Yes	

Completeness: Complete ___ Incomplete **X** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Visual Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Michael Clayton (MCA)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	resource? Is the project situated so that it changes the visual aspect of a scenic resource by being different or in sharp contrast?			
Appendix B (g) (6) (A) (ii)	Describe the existing nighttime lighting on the project site and in the vicinity.	Subsection 3.13.1.2, p. 3.13-2	Yes	
Appendix B (g) (6) (B)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within an "urbanized area" as defined in Public Resources Code section 21071, explain the project's conformance with the city/county General Plan, and city municipal code or county government code (e.g., zoning) governing scenic quality.	N/A	N/A	N/A
Appendix B (g) (6) (C)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within a non-urbanized area provide the following:	--	--	--

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Technical Area: **Visual Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Michael Clayton (MCA)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (6) (C) (i)	Show on a map the pinpoint location of the key observation point(s) (KOP) for the project. A KOP is a fixed position in a publicly accessible location where a public view of the project is analyzed and/or evaluated in the landscape. Objects of aesthetic significance are the primary focus in the KOP selection.	Subsection 3.13.1.2, pp. 3.13-4 to 3.13-5; Subsection 3.13.3.1, pp. 3.13-6 to 3.16.7; Figure 3.13-2, p. 3.13-37	Yes	
Appendix B (g) (6) (C) (ii)	If an object of aesthetic significance is not in the vicinity of the project, a KOP is to be selected based on importance to stakeholders, visibility, direct public selection, worst-case scenario, or other reason. Explain the reason the KOP was chosen. At a minimum two KOPs are to be selected.	Subsection 3.13.3.1, p. 3.13-6	Yes	
Appendix B (g) (6) (C) (iii)	Provide a color photograph(s) showing an actual line of sight at eye level during daytime and clear weather from the KOP to the project site prior to any alteration (existing condition). The photographer at the KOP is to use a standard lens. For each photograph provide the following information: camera type, lens	Subsection 3.13.3.1, Table 13.3-1, p. 3.13-7	Yes	

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	focal length, viewing angle; date and time the photograph was taken, and the distance to the project site.			
Appendix B (g) (6) (C) (iv)	Using the photograph from the KOP provide a spatially accurate and realistically photo manipulated computer simulated image of the project (photo-realistic simulation) one-year after completion of construction (existing condition plus proposed project).	Subsection 3.13.3.1, pp. 3.13-6 to 3.13-7; Subsection 3.13.3.3, pp. 3.16-9 to 3.16-10	No	See DR VIS-4
Appendix B (g) (6) (C) (v)	The KOP photograph and the photo-realistic simulation are to be capable of 11" x 17" color print by a printer capable at a minimum 600 dots per inch output resolution.	Subsection 3.13, Figures 3.13-3A to 3.13-4C	No	See DR VIS-5
Appendix B (g) (6) (C) (vi)	Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file.	Subsection 3.13, Figures 3.13-3A to 3.13-4C	No	See DR VIS-5
Appendix B (g) (6) (D)	Show and describe the project in the landscape.	Subsection 3.13, Figures 3.13-3A to 3.13-4C	No	See DR VIS-5
Appendix B (g) (6) (D) (i)	Provide an 8.5" x 11" sized scaled elevation(s) of project buildings, structures, and major equipment; a table listing their dimensions (height, length, width, diameter).	Subsection 3.13.3.2, pp. 3.13-7 to 3.13-8	No	See DR VIS-6
Appendix B (g) (6) (D) (ii)	Provide a table and description of the exterior surface treatments	Subsection 3.13.3.2, Table 3.13-2, p. 3.13-8	Yes	

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and finishes for the buildings, structures, major equipment (e.g., colors, flat and/or textured finishes), and structural materials.			
Appendix B (g) (6) (D) (iii)	Describe project specific architectural treatment or design technique mitigation unique to the project's siting at the location (e.g., camouflage, disguise, screen), if any.	Subsection 3.13.6, Table 3.13-3. pp. 3.13-20 to 3.13-25	Yes	
Appendix B (g) (6) (D) (iv)	Provide a project specific conceptual landscape design plan that conforms with the city municipal code or county government code. Include:	Appendix 1L	Yes	
Appendix B (g) (6) (D) (iv) a.	the type of plant and/or tree species, location, quantity, size, spacing at installation/planting, expected growth rates, and expected heights at one-year, five years, and maturity. Specify irrigation system components and show their locations.	Appendix 1L	Yes	
Appendix B (g) (6) (D) (iv) b.	the calculated total pervious surface amount for the project site; include the surface to be replaced, the new surface, and the total area to be landscaped.	Not provided	No	See DR VIS-7
Appendix B (g) (6) (D) (v)	Provide a project specific conceptual outdoor lighting	Subsection 3.13.3.2, p. 3.13-9; Subsection 3.13.3.5,	No	See DR VIS-8

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.	3.13d, pp. 3.13-15 to 3.13-16		
Appendix B (g) (6) (D) (v) a.	Provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non cutoff) and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires locations on a diagram or elevation.	Subsection 3.13.3.2, p. 3.13-9; Subsection 3.13.3.5, 3.13d, pp. 3.13-15 to 3.13-16	No	See DR VIS-9
Appendix B (g) (6) (D) (v) b.	Describe reflectance, the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment offsite to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object–how bright it shines–depends on the intensity of the light striking it and the materials from which it is made (e.g., glass,	Subsection 3.13.3.2, p. 3.13-9; Subsection 3.13.3.5, 3.13d, pp. 3.13-15 to 3.13-16	No	See DR VIS-10

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	reinforced concrete, structural steel).			
Appendix B (g) (6) (E)	If the project is to use a cooling tower emitting a publicly visible water vapor plume (visible plume) in the atmosphere provide the following information:	--	--	--
Appendix B (g) (6) (E) (i)	Provide the cooling tower's number of fan cells, the fan cell stack height and diameter, the exhaust mass flow rate, heat rejection rate, and exhaust temperature.	N/A	N/A	N/A
Appendix B (g) (6) (E) (ii)	Provide fogging curves specific to the cooling tower's exhaust discharge for at least three ambient air temperature conditions (a low, average, and high temperature condition).	N/A	N/A	N/A
Appendix B (g) (6) (E) (iii)	Explain if the project's forecasted visible plume emitted in the atmosphere by the cooling tower would eliminate or obstruct an existing public view of a designated or recognized scenic vista, scenic resource, and the existing visual character or quality of public views of the site and its surroundings.	N/A	N/A	N/A

Completeness: Complete ___ Incomplete X **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: September 2024

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Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.13.6, pp. 3.13-7 to 3.13-32	No	See DR VIS-11
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Subsections 3.13.7 and 3.13.8, p. 3.13-32	No	See DR VIS-12
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each	Subsections 3.13.7 and 3.13.8, p. 3.13-32	No	See DR VIS-13

Completeness: Complete ___ Incomplete **X** **DATA COMPLETENESS WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Visual Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Michael Clayton (MCA)

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	agency, and also provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsections 3.13.7 and 3.13.8, p. 3.13-32	No	See DR VIS-14

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Waste Management** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: A. Abulaban/B. Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs., tit. 20, § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.14.3 pp. 3.14-3 to 3.14-8; Subsection 3.14.4, pp. 3.14-8 to 3.14-9	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.14.1.1, pp. 3.14-1; Appendix 3.5A	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.14.9, p. 3.14-13; Appendix 1I, Section 6, p. 17	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness	Subsection 3.14.1, pp. 3.14-1 to 3.14-2; Subsection 3.14.3, pp. 3.14-3 to 3.14-8; Subsection 3.14.4, pp. 3.14-8 to 3.14-9; Subsection 3.14.5, p. 3.14-9	Yes	

DATA COMPLETENESS WORKSHEET

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Technical Area: **Waste Management** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: A. Abulaban/B. Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment (ESA) for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination. The Phase I ESA shall have been completed no earlier than one year prior to the filing of the application.	Appendix 3.5A	Yes	
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during	Section 3.14.3.3, p.p. 3.14-3 to 3.14-8; Table 3.14-2, p.p. 3.14-4	No	See DR WASTE-1 and DR WASTE-2

DATA COMPLETENESS WORKSHEET

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Technical Area: **Waste Management** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: A. Abulaban/B. Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.	to 3.14-5; Table 3.14-3, p.p. 3.14-7 to 3.14-8; Appendix 1I, Section 3, p.p. 7-11; Appendix 1I, Table 2, p.p. 13-14.		
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under California Code of Regulations, Title 23, section 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.	Subsection 3.14.1.2, p. 3.14-1; Table 3.14-1, p. 3.14-2; Section 3.14.1.3, p. 3.14-2.	Yes	
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste	Subsection 3.14.3, pp. 3.14-3 to 3.14-8; Table 3.14-2, p.p. 3.14-4 to 3.14-5; Table 3.14-3, pp. 3.14-7 to 3.14-8; Section 3.14.4, pp. 13.4-8 to 3.14-9; Appendix 1I, Section 3, pp. 7-12; Appendix 1I,	Yes	

DATA COMPLETENESS WORKSHEET

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Technical Area: **Waste Management** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: A. Abulaban/B. Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	treatment methods used, and use of contractors for treatment.	Table 2, pp. 13-14; Appendix 1I, Section 5, p. 15		
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 13.4.6, pp. 3.14-9 to 3.14-12; Table 3.14-4, pp. 3.14-9 to 3.14-10	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 3.14.7, p. 3.14-12; Table 3.14-5, p. 3.14-13	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each	Section 3.14.7, p. 3.14-12; Table 3.14-5, p. 3.14-13	Yes	

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Technical Area: **Waste Management** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: James Ackerman/Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: A. Abulaban/B. Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	agency, and provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.14.9, p. 3.14-13	Yes	

Completeness: Complete ___ Incomplete **X** **DATA ADEQUACY WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Water Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Adam White/R5 RWQCB

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.15, pp. 3.15-1 to 3.15-38	No	See DR WATER-5
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.15.8, pp. 3.15-22 to 3.15-23	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for	Subsection 3.15, pp. 3.15-1 to 3.15-36	Yes	

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:	--	--	--
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);	Subsection 3.15.6, pp. 3.15-14 to 3.15-17	No	See DR WATER-7 and DR WATER-8
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	Subsection 3.15.3, pp. 3.15-7 to 3.15-12, Subsection 3.15.6, pp. 3.15-14 to 3.15-17, Subsection 3.15.8, pp. 3.15-22 to 3.15-23	No	See DR WATER-6
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	Subsection 3.15.3, pp. 3.15-7 to 3.15-12, Subsection 3.15.6, pp. 3.15-14 to 3.15-17, Subsection 3.15.8, pp. 3.15-22 to 3.15-23	No	See DR WATER-7 and DR WATER-8
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A	N/A	N/A
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The information shall include a narrative discussion and on maps at a scale of	Subsection 3.15.1, pp. 3.15-1 to 3.15-7; Appendix 3.15A; Appendix 3.15B	Yes	

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:			
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Subsection 3.15.1, pp. 3.15-1 to 3.15-7; Appendix 3.15A; Appendix 3.15B	Yes	
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Subsection 3.15.1, pp. 3.15-1 to 3.15-7; Appendix 3.15A; Appendix 3.15B	Yes	
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	Subsection 3.15.1, pp. 3.15-1 to 3.15-7; Appendix 3.15A; Appendix 3.15B	Yes	
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	N/A	N/A	N/A
Appendix B (g) (14) (B) (v)	Groundwater wells within ½ mile if the project will include pumping.	Appendix 3.15B	Yes	
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	--	--	--
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	Subsection 3.15.3, pp. 3.15-7 to 3.15-13, Appendix 3.15A, Appendix 3.15B	No	See DR WATER-1, DR WATER-2, DR WATER-3, and DR WATER-4
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment.	Subsection 3.15.3, pp. 3.15-7 to 3.15-13; Appendix 3.15A; Appendix 3.15B	No	See DR WATER-1, DR WATER-2, DR WATER-3, and DR WATER-4

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	For source waters with seasonal variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of background material used to create this description (that is, laboratory analysis);			
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	Subsection 3.15.3, pp. 3.15-7 to 3.15-13; Appendix 3.15A, Appendix 3.15B	No	See DR WATER-1, DR WATER-2, DR WATER-3, and DR WATER-4
Appendix B (g) (14) (C) (iv)	A detailed description of all facilities to be used in water conveyance (from primary source to the power plant site), water treatment, and wastewater discharge. Include a water mass balance diagram;	N/A	N/A	N/A
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary	Subsection 3.15.3, pp. 3.15-7 to 3.15-13, Appendix 3.15A, Appendix 3.15B.	No	See DR WATER-1, DR WATER-2, DR WATER-3, and DR WATER-4

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	assurances from the water purveyor to serve the project;			
Appendix B (g) (14) (C) (vi)	For all water supplied which necessitates transfers and/or exchanges at any point, identify all parties and contracts/agreements involved, the primary source for the transfer and/or exchange water (that is, surface water, groundwater), and provide the status of all appropriate agencies' approvals for the proposed use, environmental impact analysis on the specific transfers or exchanges required to obtain the proposed supplies, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agency regulation(s);	Subsection 3.15.3, pp. 3.15-7 to 3.15-13, Appendix 3.15A, Appendix 3.15B.	No	See DR WATER-1, DR WATER-2, DR WATER-3, and DR WATER-4
Appendix B (g) (14) (C) (vii)	Provide water mass balance and heat balance diagrams for both average and maximum flows that include all process or ancillary water supplies and wastewater streams. Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and		N/A	
Appendix B (g) (14) (C) (viii)	For all projects which have a discharge, provide a copy of the will-serve letter, permit or contract with	Subsection 3.15.3, pp. 3.15-7 to 3.15-13, Appendix 3.15A, Appendix 3.15B.	No	See DR WATER-1, DR WATER-2, DR WATER-3, and DR WATER-4

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the public or private entity that will be accepting the wastewater and contact storm water from the project. The letter, permit or contract, if possible, shall identify the discharge volumes and the chemical or physical characteristics under which the wastewater and contact storm water will be accepted. In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.			

Completeness: Complete ___ Incomplete **X** **DATA ADEQUACY WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Water Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Adam White/R5 RWQCB

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	--	--	--
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area that may be affected by the project's construction and operation;	Subsection 3.15.3, pp. 3.15-7 to 3.15-12, Appendix 3.15A, Appendix 3.15B.	Yes	
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;	Subsection 3.15.3, pp. 3.15-7 to 3.15-12, Appendix 3.15A, Appendix 3.15B.	Yes	
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and	Subsection 3.15.3, pp. 3.15-7 to 3.15-12, Appendix 3.15A, Appendix 3.15B.	Yes	
Appendix B (g) (14) (D) (iv)	A copy of applicable regional and local requirements regulating the drainage systems, and a discussion of how the project's drainage design complies with these requirements.	Subsection 3.15.3, pp. 3.15-7 to 3.15-12, Appendix 3.15A, Appendix 3.15B.	Yes	
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	--	--	--

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Technical Area: **Water Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Adam White/R5 RWQCB

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	N/A	N/A	N/A
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a computer modeling study shall be conducted by a professional geologist and include the estimated drawdown on neighboring wells within 0.5 mile of the proposed well(s), any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical conditions of groundwater resources shall be provided;	N/A	N/A	N/A
Appendix B (g) (14) (iii)	The effects of construction activities and plant operation on water quality and to what extent these effects	N/A	N/A	N/A

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	could be mitigated by best management practices;			
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"	N/A	N/A	N/A
Appendix B (g) (14) (v)	If using fresh water, include a discussion of the cumulative impacts, alternative water supply sources and alternative cooling technologies considered as part of the project design. Include an explanation of why alternative water supplies and alternative cooling are "environmentally undesirable," or "economically unsound;"	N/A	N/A	N/A
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones; and	Subsection 3.15.1.4, p. 3.15-7; Appendix 3.15A; Appendix 3.15B	Yes	
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	N/A	N/A	N/A

Completeness: Complete ___ Incomplete **X** **DATA ADEQUACY WORKSHEET** Revision No. 0 Date: September 2024

Technical Area: **Water Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Adam White/R5 RWQCB

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.15.6, pp. 3.15-14 to 3.15-15	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.15.7, p. 3.15-22	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.15.7, p. 3.15-22	Yes	

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Technical Area: **Water Resources** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Adam White/R5 RWQCB

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.15.7, p. 3.15-22	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Project: Potentia-Viridi

Technical Area: **Wildfire** Battery Energy Storage System Technical Staff: Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.17.2, pp. 3.17-7 to 3.17-17; Appendix 3.17A	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.17, p. 3.17-1; Subsection 3.17.3.1, p. 3.17-6; Subsection 3.17.4, p. 3.17-14; Subsection 3.17.9, pp. 3.17-28 to 3.17-30; Appendix 3.15A; Appendix 3.17A	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used	Subsections 3.17.1 to 3.17.3.3., pp. 3.17-1 to 3.17-17	No	See DR FIRE-1

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Wildfire** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (19) (A)	A map showing State Responsibility Areas (SRA,) as defined in Public Resources Code section 4102, relative to the proposed project.	Section 3.17, Figure 3.17-1, p. 3.17-31	Yes	
Appendix B (g) (19) (B)	A map showing state Fire Hazard Severity Zones, as defined in 14 CCR section 1280.01, relative to the proposed project.	Section 3.17, Figure 3.17-1, p. 3.17-31	Yes	
Appendix B (g) (19) (C)	If the project would be in the vicinity of an SRA or a Very High Fire Hazard Severity Zone, as defined in 14 CCR section 1265.00, provide:	--	--	--
Appendix B (g) (19) (C) (i)	Local emergency response or evacuation plans and a description of how the proposed project could influence their effectiveness.	Subsection 3.5.3.3, p. 3.5-13; Subsection 3.17.3.3, pp. 3.17-6 to 3.17-7; Appendix 3.17A	No	See DR FIRE-2
Appendix B (g) (19) (C) (ii)	A discussion of how potential project pollutants could be contained onsite during a wildfire event.	Subsection 3.17.3.3, pp. 3.17-7 to 3.17-11	Yes	
Appendix B (g) (19) (C) (iii)	A description of infrastructure that would be built or maintained (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate the risk of wildfire.	Subsection 3.17.3.3, pp. 3.17-11 to 3.17-13	Yes	

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Completeness: Complete ____ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Wildfire** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Paul Miller

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (19) (C) (iv)	Describe people or structures downslope or downstream of the proposed project that could be impacted by flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Subsection 3.17.3.3, pp. 3.17-13 to 3.17-14	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Worker Safety** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Daniel Jones

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.16, pp. 3.16-1 to 3.16-5; Subsection 3.16.1.4, p. 3.16-17	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Subsection 3.16.6, p. 3.16-19	Yes	

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Worker Safety** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Daniel Jones

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 3.16.1 pp. 3.16-1 to 3.16-17	No	See DR WS-1, DR WS-2, and DR WS-3
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Subsection 3.16.2.3.3, pp. 3.16-15 to 3.16-16, Table 3.16-3 and Table 3.16-4; Appendix 3.17A, Subsection 3.3.9, pp. 26 to 27	No	See DR WS-1
Appendix B (g) (11) (B)	A complete description of the fuel handling system and the fire suppression system.	Subsection 3.16.1.4, p. 3.16-17; Subsection pp. 3.17-9 to 3.17-11; Appendix 1O, Section 5, pp. 21 to 32	No	See DR WS-2
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program	--	--	--

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete **X** Revision No. 0 Date: September 2024

Technical Area: **Worker Safety** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Daniel Jones

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	and the Operation Health and Safety Program, as follows:			
	Construction Health and Safety Program: • Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);	Subsection 3.16.2.3.1, p. 3.16-6	Yes	
	• Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);	Subsection 3.16.2.3.1, p. 3.16-6	No	See DR WS-2 and DR WS-3
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)	Subsection 3.16.2.3.1, pp. 3.16-6 to 3.16-7	Yes	
	Operation Health and Safety Program: • Injury and Illness Prevention Program (8 Cal. Code Regs., §3203);	Subsection 3.16.2.3.2, p. 3.16-10	Yes	
	• Fire Prevention Plan (8 Cal. Code Regs., § 3221);	Subsection 3.16.2.3.2, p. 3.16-11	No	See DR WS-2 and DR WS-3
	• Emergency Action Plan (8 Cal. Code Regs., § 3220);	Subsection 3.16.2.3.2, p. 3.16-11	Yes	
	• Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411).	Subsection 3.16.2.3.2, pp. 3.16-11 to 3.16-12	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall	Subsection 3.16.3, Table 3.16-5, pp. 3.16-17 to 3.16-18	No	See DR WS-1

DATA COMPLETENESS WORKSHEET

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Technical Area: **Worker Safety** Project: Potentia-Viridi Battery Energy Storage System Technical Staff: Daniel Jones

Project Manager: Ann Crisp Docket: 24-OPT-04 Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.16.4, Table 3.16-6, pp. 3.16-18 to 3.16-19	No	See DR WS-5
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.16.4, Table 3.16-6, pp. 3.16-18 to 3.16-19	No	See DR WS-4
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.16.5, p. 3.16-19	No	See DR WS-5

Attachment B

Data Requests

Attachment B Data Requests

MANDATORY OPT-IN REQUIREMENTS

California Code of Regulations, title 20, section 1877(b) requires the opt-in application to contain an explanation of how the facility meets the definition of facility specified in Public Resources Code section 25545(b). If the application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application is required to contain a detailed description of how the facility meets the criteria specified in section 25545(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technologies.

DR MAND-1. Provide a discussion of how the Potentia-Viridi Battery Energy Storage System would meet the requirements of discretionary project seeking certification under the opt-in application process.

California Code of Regulations, title 20, section 1877(f) requires Opt-In Applications to identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code, section 25545.9. California Code of Regulations title 20, section 1879(a)(7) further states that the net positive benefits may include, but are not limited to the following: (a) employment growth, (b) housing development, (c) infrastructure and environmental improvements, (d) assistance to public schools and education, (e) assistance to public safety agencies and departments, and (f) property taxes and sales and use tax revenues.

The opt-in application (application) includes a Socioeconomic Analysis (Confidential Appendix 3.10A) that uses the IMPLAN model, an Input/Output modeling framework, to calculate gross positive economic benefits to Alameda County. However, the analysis does not provide a calculation of the ***net*** positive economic benefit to the local government (i.e., Alameda County) required in California Code of Regulations, title 20, section 1877(f). The economic metrics provided for employment and tax revenue do not account for a net change in these metrics.

Additional application materials reviewed by CEC staff (staff) include Section 3.10, Socioeconomics and Appendix 1C, Community Benefits Plan. The economic analysis provided in Section 3.10 does not present preliminary analysis regarding “net positive economic benefit to the local government” required in California Code of Regulations, title 20, section 1877(f).

Opt-In requirements require the applicant to include the applicant's strategy, including timeline for execution, to obtain a legally binding and enforceable Community Benefits Agreement (Pub. Res. Code, § 25545.10 and Cal. Code Regs., tit. 20, § 1877(g)). A Community Benefits agreement can be used as part of the information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility. The Community Benefits Plan in Appendix 1C is a summary of the community organizations under review by the applicant to eventually enter into an agreement with. The Community Benefits Plan does not include information identified in California Code of Regulations, title 20, section 1879(a)(7), and under Public Resources Code section 25545.9.

A net analysis should consider all project-related economic effects that result from a change in production or spending in the economy. A model that calculates net positive economic benefit would incorporate other economic impacts (or what are known as negative events in IMPLAN as described below) beyond the overall gross impacts of the project such as:

- The opportunity cost of investment in the proposed project;
- Projected cost of the city providing services to the project;
- Local economic development losses associated with the displacement of an existing energy source; or
- Potential increases or decreases in electricity rates or fuel prices resulting from project investments in new energy storage infrastructure.

A net analysis should also include the gain and loss of jobs when calculating the net employment impact. A net analysis will consider the differences of the economic outputs from a proposed project versus the outputs from the current use. Staff has had several discussions with IMPLAN, LLC, and has been informed that IMPLAN does calculate net benefits of projects by including multiple events in the analysis (e.g., including a negative dollar amount in an industry that is being replaced by the project, and a positive amount in the new industry or project). Please refer to the example at https://support.implan.com/hc/en-us/articles/360037695753-Net-Analysis-Switching-to-Solar-Energy, which presents a use case scenario of net analysis for a solar project.

When demonstrating overall net positive economic benefit to Alameda County, the negative economic effects (i.e., negative "event" in IMPLAN) must be included. For example, the projected cost of the County providing public services to the project should be factored into the consideration of net benefits of the proposed project to the local jurisdiction. In this case, since the proposed project site is currently on agricultural land under a Williamson Act contract used for cattle grazing, a determination of whether, or not, the economic outputs from the proposed project-generated property tax would change from the economic outputs from the property taxes of the current permitted agricultural use of the site. This is an example that can help provide information on the net benefits of the project. Specific assumptions for positive,

negative, or neutral effects to the industry from the project must be made to properly estimate the net benefits.

DR MAND-2. Pursuant to California Code of Regulations, title 20, section 1877(f) requirement, please provide:

a. Updated "...preliminary information that demonstrates overall ***net*** positive economic benefit to the local government that would have had permitting authority over the site and related facility."

b. The assumptions used to run the economic model updates, including:

   i. A list of specific assumptions (i.e., inputs) for the economic model (e.g., IMPLAN or additional assumptions outside of IMPLAN) that estimates net benefits (including positive and negative economic events). Note that a negative economic event is not necessarily a negative economic effect of the project. See above discussion for definition of negative event.

   ii. The assumptions for all benefits identified, as well as the "negative events," including employment growth, infrastructure improvements, and property and sales tax revenues.

   iii. If IMPLAN is utilized, export the IMPLAN project configuration file and provide the downloaded .JSON file.

   iv. A list of specific assumptions for utility interconnect fees for initial connection and ongoing connection fees.

   v. Battery energy storage system (BESS) specifications including specifics around roundtrip system efficiency, degradation factor, functionality from years 20-35, and maintenance estimates.

   vi. Information about the location of production for the BESS, highlighting any specific local production and assumptions related to available tax credits for the system, including from the Inflation Reduction Act, and other incentives available to the project.

   vii. Capital and O&M costs for the lifetime of the system.

   viii. Assumptions related to expected annual revenues of the BESS.

California Code of Regulations, title 20, section 1877(h) requires a discussion of whether the project meets the requirements of Public Resources Code, sections 21183 and 21183.6. The application does not include a discussion of those sections.

DR MAND-3. Provide a discussion of whether the project meets the requirements of Public Resources Code, sections 21183 and 21183.6.

DR MAND-4. Discuss if the project would result in a minimum investment of $100,000,000 in California upon completion. See Public Resources Code, section 21183(a).

DR MAND-5. Discuss if the project would create high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, help reduce unemployment, and promote apprenticeship training. See Public Resources Code, section 21183(b).

Public Resources Code, section 21183.6(a) requires that environmental leadership development projects or leadership projects, described in Public Resources Code, section 21180 (b) (1), (2), or (3), to identify the quantification and mitigation of the greenhouse impacts of a project as follows: (1) the environmental baseline for greenhouse gas emissions shall be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted in a manner consistent with California Code of Regulations, title 14, section 15125 as those regulations existed on January 1, 2021. The project as an Opt-In project, may be deemed an environmental leadership development project under Public Resources Code, section 25545.13 (a) if conditions are met; however, additional information is needed for staff to make the determination. The applicant did not discuss the GHG baseline conditions or existing setting. Also, there was no mention of the Bay Area Air Quality Management District's (BAAQMD or District) approach for identifying GHG thresholds, nor was the local GHG reduction strategy identified. Lastly, there was no discussion of the GHG emissions from fossil fuels that would be offset over the project's lifetime. Staff requests quantification of the GHG emissions in **DR GHG-1**, **DR GHG-2**, **DR GHG-6**, **DR GHG-7** and **DR GHG-8**.

DR MAND-6. Please include a discussion of the baseline conditions of GHG. Please describe the existing GHG setting, including the regulatory setting. Include a discussion of BAAQMD's approach to GHG analysis and significance thresholds and the local GHG reduction strategy. Discuss the GHGs emitted by sources that would be reduced as a result of the project to bring the project into net-zero emissions and beyond, etc.

AIR QUALITY

Section 3.1.3.2.2 states that the project would install one 200-horsepower emergency diesel generator. California Emissions Estimator Model (CalEEMod) was used to estimate criteria air pollutant emissions of the generator. Staff requires more information about the emergency generator.

DR AQ-1. Please provide the engine manufacturer specification sheets, including the criteria air pollutant emissions, the heating value and chemical characteristics of the proposed fuels, the stack height and diameter, and the exhaust velocity and temperature. Please provide a description of the control technologies proposed to limit the emission of criteria pollutants.

DR AQ-2. Please provide a screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant (using AERSCREEN or AERMOD) demonstrating that the project commissioning and operation, including

the emergency generator and other emission sources included in Table 3.1-8, would comply with ambient air quality standards. Please provide the associated modeling files and results.

DR AQ-3. Please provide a cumulative air quality modeling impacts analysis of the project's emergency generator in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. Otherwise, provide justification for why a cumulative modeling analysis is not needed, considering things such as, engine emission rates, location of maximum impacts, distance from sensitive receptors and distance from other permitted sources.

The applicant utilized CalEEMod to calculate the air pollution emissions for the construction and operation of the project. The CalEEMod results show emission estimates for both mitigated and unmitigated construction activities. Mitigation includes use of dust suppressants and limiting vehicle speeds. However, staff needs more detailed information on all best management practices the applicant proposes to employ to mitigate construction related impacts.

DR AQ-4. Please provide a detailed description of the mitigation the applicant plans on utilizing to reduce construction related impacts.

Public Resources Code section 25545.1(b)(1) provides that the issuance of a certificate by the California Energy Commission (CEC) is in lieu of any local air quality permit that would have been issued from the Bay Area Air Quality Management District (BAAQMD or District) and such permit requirements are incorporated into the CEC's opt-in application requirements in California Code of Regulation, title 20, section 1877(d), Appendix B (g)(8)(E) and (i), and CEC's certification. To assist CEC staff and the District in reviewing the project, the applicant should submit the necessary information to the District. To ensure the District's requirements are contained in the CEC's Staff Assessment and Environmental Impact Report (EIR) and certification, staff needs copies of all correspondence between the applicant and the District in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

DR AQ-5. Since an emergency generator would be used, please provide a completeness determination letter from the BAAQMD confirming that the application submitted to the District has been deemed complete.

DR AQ-6. Please provide tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.

DR AQ-7. Please provide the name, title, phone number, address (required), and

email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for CEC staff.

Staff compared emission rates used in the applicant's ambient air quality analysis (AAQA) for construction (TN 258061) and those estimated from CalEEMod in the emissions calculations (TN 258060). As shown in the following summary table, staff understands that the carbon monoxide (CO), sulfur oxides (SOx), particulate matter of 10 micrometers or less in diameter (PM10) emissions used in the AAQA are from the mitigated summer maximum emissions estimated in CalEEMod. However, the oxides of nitrogen (NOx) and particulate matter of 2.5 micrometers or less in diameter (PM2.5) emissions used in the AAQA were from the mitigated winter maximum emissions estimated in CalEEMod. A justification is necessary to explain using the less conservative emission rates for NOx and PM2.5 in the AAQA for construction.

	NOx	CO	SOx	PM10 Exhaust	PM10 Fugitive	PM10 Total	PM2.5 Exhaust	PM2.5 Fugitive	PM2.5 Total
Maximum Emission Rates (lbs/day) Used for Ambient Air Quality Analysis (page 149 of 159 of TN 258061)	22.16	116.52	0.18	-	0.00	1.84	-	0.00	0.43
Mitigated Daily Summer Maximum Emissions from CalEEMod for HRA (page 124 of 219 of TN 258060)	32.6	117	0.18	0.51	1.33	1.84	0.50	0.17	0.66
Mitigated Daily Winter Maximum Emissions from CalEEMod for HRA (page 124 of 219 of TN 258060)	22.1	89.1	0.13	0.44	1.31	1.46	0.43	0.16	0.43

DR AQ-8. Please provide justification for using the less conservative emission rates for NOx and PM2.5 in the AAQA for construction.

DR AQ-9. Please update the AAQA for construction using conservative emission rates if deemed necessary.

As shown in the following summary table, staff found discrepancies between the AERMOD maximum impact X/Q (micrograms per cubic meter/grams per second) $(\mu g/m^3)/(g/s)$ values shown in the AAQA for construction in the application (TN 258061) and those from the actual AERMOD modeling files provided by the applicant. Staff

needs clarification regarding the discrepancies and an update in the AAQA for construction using the actual AERMOD outputs if necessary.

	Max 1-Hour	Max 3-Hour	Max 8-Hour	Max 24-Hour	Max Annual
AERMOD Maximum Impact X/Q on page 149 of 159 of the Ambient Air Quality Analysis (TN 258061)	325.70	214.57	186.44	119.27	56.01
X/Q from AERMOD Files	1196.78	499.13	400.96	144.21	33.07

DR AQ-10. Please provide clarification regarding the discrepancies between the X/Q values used in the AAQA for construction as shown in the application (TN 258061) and those from the actual AERMOD modeling files.

DR AQ-11. Please update the AAQA for construction using the actual AERMOD outputs if deemed necessary.

Table 3.1-6 and Table 3.1-7 on page 3.1-21 of Section 3.1, Air Quality, show that the annual PM10 impact of 1.62 µg/m^3 and annual PM2.5 impact of 0.38 µg/m^3 of the project during construction would exceed the Class II Significant Impact Levels (SILs) of 1 µg/m^3 and 0.2 µg/m^3 respectively. The annual PM2.5 impact would also exceed the BAAQMD California Environmental Quality Act (CEQA) Guidelines significance threshold of 0.3 µg/m^3. Since the San Francisco Bay Area Air Basin (SFBAAB) is in nonattainment for PM10 and PM2.5 California Ambient Air Quality Standards (CAAQS), the project emissions would make a significant contribution to the existing regional exceedances of PM10 and PM2.5 CAAQS. In addition, the U.S. EPA has strengthened the primary annual PM2.5 National Ambient Air Quality Standard (NAAQS) from 12.0 µg/m^3 to 9.0 µg/m^3, which became effective on May 6, 2024. The project construction activities, as currently modeled, would make a significant contribution to the existing exceedance of the new annual PM2.5 NAAQS. Staff needs more refined modeling analysis to demonstrate that the project impacts would not exceed SILs at sensitive receptors (including residences). If refined modeling analysis still shows SILs exceedance, additional mitigation measures may be needed to reduce the project's impacts to less than significant.

DR AQ-12. Please provide a refined AAQA for annual PM10 and annual PM2.5 impacts during construction to demonstrate that the project impacts would not exceed SILs at sensitive receptors (including residences). A refined approach may include using the annual emissions, instead of maximum daily emissions, for annual impacts analysis.

DR AQ-13. Please provide additional mitigation measures to reduce construction PM10 and PM2.5 impacts to less than significant if deemed necessary.

GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)

In accordance with Appendix G of the CEQA Guidelines (Cal. Code Regs., tit. 14 § 15000 et seq.), staff must determine whether the project will generate greenhouse gas

emissions, either directly or indirectly, that may have a significant impact on the environment and whether the project will conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (GHGs). California Code of Regulations, title 20, section 1877(h) also requires a discussion of whether the project meets the requirements of Public Resources Code, section 21183.6, which requires quantification and mitigation of the project's GHG emission impacts. Staff needs more details as described below.

DR GHG-1. Please provide a table itemizing all emission sources and corresponding GHG emissions for both project construction and operation phases.

DR GHG-2. Please demonstrate that the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation.

DR GHG-3. Has the project applicant explored the procurement of renewable diesel for the emergency generator as a means of demonstrating consistency with the goal of carbon neutrality established in SB 100 and BAAQMD's Diesel Free by '33? If not, why not?

DR GHG-4. Please demonstrate how the project would comply with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

The application does not discuss whether the circuit breakers and gas-insulated switchgear would contain sulfur hexafluoride (SF_6). According to the California Code of Regulations, title 17, sections 95350 through 95359.1, starting on the applicable phase-out dates, no person may acquire SF_6 gas-insulated equipment (GIE) for use in California unless certain provisions apply.

DR GHG-5. Please confirm whether or not the project would use SF_6 in the circuit breakers and/or gas-insulated switchgear.

DR GHG-6. If the project is proposing to use SF_6, please describe how the project would comply with the phase-out provisions and quantify the associated CO2e emissions.

Pursuant to California Code of Regulations, title 20, Appendix B (g)(1), (g)(8)(E), and Appendix G of the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), staff needs to better understand the direct and indirect GHG emissions associated with the battery energy storage system (BESS). If grid power is used to charge the BESS, staff needs to know the indirect GHG emissions associated with the loss in round-trip efficiency for charging/discharging and GHG emission intensity from the electrical grid during charging. Staff also needs to better understand the GHG emissions associated with BESS cooling.

DR GHG-7. Please provide the loss in round-trip efficiency for the

charging/discharging cycle, and the GHG emission intensity factor during charging.

DR GHG-8. Please clarify whether GHG emissions would be associated with the BESS cooling. If GHG emissions are expected, please provide the estimated amounts of these GHG emissions.

ALTERNATIVES

Section 4 Alternatives (TN 258035) of the application summarizes the applicant's site planning process (subsection 4.5.1 Alternative Locations, p. 4-4). It states: "Several alternative site locations were considered but subsequently rejected from further analysis because they would result in greater impacts than the project, primarily due to the construction of a much longer gen-tie line from the project site to the Tesla Substation."

DR ALT-1. Data is required that evaluates the comparative environmental merits of alternative sites to the proposed project site. Please provide assessor's parcel numbers and large-scale, zoomed in maps showing the locations of the alternative sites that were considered and rejected. Please provide additional data on these sites that was collected prior to submittal of the application (i.e., specific information from a preliminary site assessment or constraints analysis).

BIOLOGICAL RESOURCES

Incidental Take Permit Application

The California Endangered Species Act (CESA) prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. For purposes of CESA "take" means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill these species (Fish and G. Code, § 86). The CDFW may authorize the take of any such species if the conditions listed in California Code of Regulations, title 14, section 783.4 subdivisions (a) and (b) are met. An incidental take permit (ITP) allows a permittee to take a CESA-listed species if such taking is incidental to, and not the purpose of, carrying out an otherwise lawful activity. The applicant is requesting take coverage for California tiger salamander (*Ambystoma californiense*), golden eagle (*Aquila chrysaetos*), San Joaquin kit fox (*Vulpes macrotis*), and tricolored blackbird (*Agelaius tricolor*) as included in the ITP application included as Appendix 3.2E of the opt-in application (TN 258198). Accordingly, the applicant must include the information required in California Code of Regulations, title 14, section 783.2(a)(1) to (a)(10). (Cal. Code Regs., tit. 20, § 1877(a).)

For golden eagle, the ITP application states in Section 3.2.3 that the applicant does not anticipate potential take of golden eagle from the project as no potential nesting habitat would be impacted, and the project site only provides marginal foraging habitat. However, based on a review of Photos 9 and 11 on page D-3 of Appendix D of the

Biological Resources Technical Report (Appendix B of the ITP application) staff notes trees within the project area that may provide raptor nesting habitat.

In addition, golden eagle is designated as a fully protected species in Fish and Game Code section 3511(b)(5) and CEC staff, in coordination with California Department of Fish and Wildlife (CDFW), cannot authorize take under an ITP unless the project meets the conditions and requirements set forth in Fish and Game Code section 2081.15 (Fish & G. Code, § 3511). Among these requirements, the project must be within the categories of projects eligible for issuance of an ITP for take of fully protected species (Fish & G. Code, § 2081.15(b)(1) to (5)). The applicant must also demonstrate that for each fully-protected species for which take is to be authorized: (1) all requirements under Fish and Game Code section 2081(b) and (c) are met as to the species for which take is authorized; and (2) the project includes all further measures necessary to satisfy the conservation standard of Fish and Game Code section 2805(d) and take is avoided to the maximum extent possible; and (3) the ITP provides for the development and implementation, in cooperation with CDFW, and federal and state agencies, as applicable, of a monitoring program and an adaptive management plan, approved by CDFW, that satisfy the conservation standard of Fish and Game Code section 2805(d) for monitoring the effectiveness of, and amending, as necessary, the measures to minimize and fully mitigate the impacts of the authorized take (Fish & G. Code, §§ 2081.15(a)(1)-(3)).

DR BIO-1. Please update the ITP application and provide a detailed habitat assessment for golden eagle. Include in the detailed habitat assessment a description of the suitability of nesting habitat within the project area and surrounding lands and recent protocol-level survey results within suitable nesting habitat to facilitate an assessment of potential take of golden eagle from the project or activity for which the permit is sought and impacts of the proposed taking on this species. Recent surveys are defined as surveys conducted during the most recent breeding/nesting season based on the submittal of the application. At this time of year, it would be this calendar year's breeding/nesting seasons. If protocol surveys were not conducted recently then protocol surveys will need to be conducted during the next breeding/nesting season.

DR BIO-2. Please provide additional information to explain whether and how the project may qualify for issuance of an ITP for fully protected species, including information about the nature of the project and its impacts as necessary to assess compliance with the requirements of Fish and Game Code, section 2081.15.

DR BIO-3. If the project would not comply with the ITP issuance criteria in Fish and Game, section 2081.15, update the ITP application to include measures to ensure that golden eagle would be avoided (i.e., no take of golden eagle would occur).

For tricolored blackbird, Section 3.4.2 of the application states that tricolored blackbird

was observed foraging on the project site, but no suitable nesting habitat is present onsite. The wetland habitat located 0.5 miles from the project site was determined by the applicant to likely be too small to sustain a colony. Section 3.4.3 of the application states that construction activities would not cause direct impacts to tricolored blackbird but would cause permanent loss of potential foraging habitat.

DR BIO-4. Please provide a detailed habitat assessment for tricolored blackbird within the project area and surrounding lands within a minimum of 0.5 miles of the project boundaries, include recent results of protocol-level survey results within suitable nesting habitat and a clear analysis of whether and to what extent the project or activity for which the permit is sought could result in take of tricolored blackbird and impacts of the proposed taking on this species. Recent surveys are defined as surveys conducted during the most recent breeding/nesting season based on the submittal of the application. At this time of year, it would be this calendar year's breeding/nesting seasons. If protocol surveys were not conducted recently then protocol surveys will need to be conducted during the next breeding/nesting season.

DR BIO-5. If the additional impacts analysis for tricolored blackbird indicates impacts to this species that were not fully analyzed and mitigated in the current ITP application, then CEC staff, in coordination with CDFW, requests additional proposed measures to minimize and fully mitigate the impacts of the proposed taking of this species.

Crotch's bumble bee (*Bombus crotchii*) is currently a candidate species for listing under CESA with known occurrences in Alameda County. Under CESA, a candidate species for which notice has been given under Fish and Game Code, section 2074.4 is afforded the same protections as a threatened or endangered species (Fish & G. Code, § 2085), including the prohibition on take without appropriate authorization. The ITP application does not assess impacts to Crotch's bumble bee or request take coverage for this species. Appendix B, of the ITP application, included as Appendix 3.2E of the opt-in application, indicates floral resources, which may support Crotch's bumble bee, are present within the project area. Thus, Crotch's bumble bee may require take coverage.

DR BIO-6. Please include a detailed impacts analysis for Crotch's bumble bee and recent results of a protocol-level survey. More information on the appropriate Crotch's bumble bee habitat assessment and survey protocol can be found in the *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* document located on the CDFW website at https://wildlife.ca.gov/Conservation/CESA. Recent surveys are defined as surveys conducted during the most recent survey season based on the submittal of the application. At this time of year, it would be this calendar year's survey season. If protocol surveys were not conducted recently then protocol surveys will need to be conducted during the next survey season.

DR BIO-7. If this additional information for Crotch's bumble bee indicates that the project or activities for which the permit is sought may cause take of Crotch's bumble bee, please revise the ITP to request take coverage for this species. This additional request for take coverage must include all information that would be required in an ITP application for CESA-listed or candidate species, including an impacts analysis and proposed mitigation measures (Cal. Code of Regs., tit.14, § s 783.2).

Swainson's hawk (*Buteo swainsoni*) is listed as threatened under CESA. The ITP application does not assess impacts to Swainson's hawk from the project or request take coverage for SWHA. Based on observations reported in eBird (2020 and 2022), and reported by Swainson's hawk biologist, Jim Estep on August 25, 2023 (pers. comm. to CDFW) a pair of Swainson's hawk has been observed exhibiting territorial or breeding behavior in the vicinity of the project site and an inactive nest has been reported within 0.3 miles to the west of the project site. SWHA have also been documented less than 0.1 mile from the project area (J. Estep, 2023, pers. Comm. to CDFW). If Swainson's hawk pair(s) nest in proximity to the project, construction activities could result in take through nest abandonment.

DR BIO-8. Please update the ITP application to include a detailed habitat assessment for Swainson's hawk, recent survey results based on a protocol-level methodology, and an impacts analysis to assess the potential for take of Swainson's hawk during construction, operation and decommissioning of the project. Surveys should be based on the *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (Swainson's Hawk Technical Advisory Committee, May 31, 2000). Recent surveys are defined as surveys conducted during the most recent breeding/nesting season based on the submittal of the application. At this time of year, it would be this calendar year's breeding/nesting seasons. If protocol surveys were not conducted recently then protocol surveys will need to be conducted during the next breeding/nesting season.

DR BIO-9. If this additional information for Swainson's hawk indicates that the project or activities for which the permit is sought may cause take of Swainson's hawk, please revise the ITP to request take coverage for this species. This additional request for take coverage must include all information that would be required in an ITP application for CESA-listed or candidate species, including an impacts analysis and proposed mitigation measures (Cal. Code of Regs., tit. 14, § 783.2).

For the purposes of the ITP, as well as the accurate analysis for impacts to biological resources in general, the overall project footprint should be described accurately and consistently across all documents.

DR BIO-10. The project site is stated to be 70 acres in the ITP application, while other documents in the application indicate the project site is approximately 85 acres. Please clarify the size of the project site (in acres) and define the sizes for the

BESS facility footprint and gen-tie corridor (in acres).

The notes section of Table 2 in the ITP application included as Appendix 3.2E of the application, states that "[T]he total permanent disturbance acreage is a conservative estimate, and final designs may require fewer acres".

DR BIO-11. Please provide the most current project design and most accurate permanent impact amounts to enable accurate assessment of impacts of the project and covered activities on CESA listed and candidate species and to determine the amount of compensatory mitigation needed to offset the impacts. The impact amounts must be estimated for project construction, any maintenance and repair during operations as well as decommissioning. If actual impacts are greater than what the applicant estimated, additional mitigation would need to be provided.

Section 2.2.8. Table 4 and Section 1.1 of the ITP application, indicates Pacific Gas and Electric Company (PG&E) would be responsible for a portion of the transmission and interconnection facilities. Table 4 shows permanent and temporary disturbance areas for both the applicant and PG&E portions.

DR BIO-12. Please clarify whether the ITP application includes a request for take coverage for activities in the PG&E disturbance area and provide the proposed compensatory mitigation for the PG&E portion of the project.

DR BIO-13. Please clarify whether PG&E is conducting activities anticipated to cause take of CESA-listed or candidate species and what these activities would be. A separate ITP application may be needed to be submitted by PG&E to CEC in coordination with CDFW.

Subsection 2.2.9 of the ITP application, states that "[T]he gen-tie would be designed consistent with the *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (Avian Power Line Interaction Committee [APLIC] 2006), where feasible". Use of the term "where feasible" is vague. All gen-tie lines should conform to APLIC requirements to avoid avian electrocution.

DR BIO-14. Please revise the ITP application to clearly identify which sections of gen-tie may not be consistent with APLIC guidelines and why. For all the sections of gen-tie line that would not conform to APLIC requirements please explain how the applicant would assure that avian electrocution would be avoided.

Subsection 2.2.14.1 and Section 5.2 of the ITP application, states construction work is anticipated to occur over approximately 18 months. However, Section 5.2 also states that work would be avoided within California tiger salamander suitable habitat from October 15 (or the first measurable fall rain of 1" or greater), to May 1. Staff, in coordination with CDFW, does not recommend ground disturbing work during the wet season (October to April) which corresponds to the California tiger salamander active period.

DR BIO-15. Please clarify the work periods for all ground disturbing and construction activities anticipated during the 18-month construction period.

Section 2.2.14.3 of the ITP application, states that “environmental clearance surveys” would be performed prior to the start of construction.

DR BIO-16. Please provide additional information on the types and purpose of these surveys, including the species to be surveyed for and duration of any surveys.

Section 2.2.14.4 of the ITP application, states that blasting may be required during construction, but the application does not explain whether and how blasting may impact CESA-listed and candidate species. Blasting has a high potential to disturb nesting birds and should be further assessed for impacts to special-status avian species.

DR BIO-17. Please evaluate and discuss how blasting would impact special-status avian species. Please provide decibel (dB) levels for the activity and duration and timing of blasting.

Section 2.2.16.4 of the ITP application did not analyze any additional impacts to CESA-listed or candidate species during the decommissioning phase.

DR BIO-18. Please analyze additional impacts to CESA-listed or candidate species during the decommissioning phase.

Subsections 5.2.1, 5.3.1, 5.4.1, and 5.5.1 of the ITP application, include compensatory mitigation for permanent impacts to habitat for covered species by purchasing credits at a CDFW-approved mitigation bank or another site to be approved by CEC staff, in coordination with CDFW. The ITP application uses the East Alameda County Conservation Strategy (EACCS) to determine mitigation ratios, however, the score sheets included in the application are not appropriately used for determining bank credit amounts. Furthermore, the impact table used is incorrect for California tiger salamander. The table indicates that California tiger salamander habitat is not present within dispersal distance of the project site. However, based on the habitat assessment described elsewhere in the ITP application, the project site supports upland habitat for California tiger salamander and breeding ponds are located just outside of the project area. The ITP application proposes onsite restoration of temporarily-disturbed areas to pre-project conditions but does not include any compensatory mitigation for temporary impacts.

DR BIO-19. Please provide clarification on how and to what extent the temporary disturbance would impact the California tiger salamander and propose minimization and/or compensatory mitigation measures to minimize and fully mitigate temporary impacts. Update the ITP application to include a proposed mitigation and monitoring plan to monitor compliance with the minimization and mitigation measures and the effectiveness of the measures.

Section 5.6 of the ITP application describes the purchase of mitigation credits prior to construction to provide compensatory mitigation for permanent impacts to habitat.

DR BIO-20. Please include language stating that prior to the purchase of bank credits, the applicant would obtain approval from CEC staff, in coordination with CDFW, to ensure the mitigation bank credits are appropriate to compensate for the impacts of the project.

DR BIO-21. Please sign and date the Certification page, Section 6 of the ITP.

DR BIO-22. Please provide the identity and contact information for the applicant proposing the project (name, mailing address, phone number, and e-mail address). For the purposes of notification, the "applicant" is the person, State or local government agency, or public utility proposing the project. "Person" means any natural person or any partnership, corporation or limited liability company, trust, or other type of association (Fish & G. Code, § 67). Please provide the identity and contact information for the contact person/designated representative authorized to act on behalf of the applicant and property owner where project activities will take place, if either or both are different from the applicant.

Lake and Streambed Alteration Agreement Notification

Section 1.1.1 of the Draft Lake and Streambed Alteration Agreement (LSAA) Application, included as Appendix 3.2F of the opt-in application (TN 258201), discusses the seasonal work period. Pursuant to Fish and Game Code, section 1602, an entity must notify CDFW (and obtain a Lake or Streambed Alteration Agreement, if one is required under section 1602) before conducting any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of any river, stream, or lake;
- Substantially change the bed, channel, or bank of any river, stream, or lake;
- Substantially use material from the bed, bank, or channel of any river, stream, or lake; or
- Deposit or dispose of specified materials (including debris or waste) where they may pass into any river, stream, or lake.

Under Lake and Streambed Alteration regulations, a "project" for purposes of Fish and Game Code, section 1600 et seq. is any single activity that is subject to the section 1602 notification requirement, or a group of such activities that are interrelated and could or will impact similar fish and wildlife resources. (California Code of Regulations, title 14, section 699.5(a)(1) and (a)(11).) Section 1.1.3 of the LSAA Application describes construction of all components of the project for the 70 to 85-acre project as a whole, including the BESS, substation, access roads, laydown yards, etc., rather than focusing on the aspect(s) of the project that may affect the on-site ephemeral stream (Patterson Run) and thus may be subject to Fish and Game Code, section 1600 et seq..

DR BIO-23. Please update and include in the revised LSAA notification a seasonal work period or periods for the specific activity or activities that may affect the bed, bank or channel of Patterson Run or any other streams, rivers, or lakes on-site in the manner specified in Fish and Game Code, section 1602.

As stated above, the LSAA Application (Appendix 3.2F) describes all components of the project rather than focusing on the activity or activities that may affect streams, rivers, or lakes (including the Patterson Run stream). Section 1.1.20, of Appendix 3.2F, page 24 suggests that two "projects", namely improvements to an existing culvert under Patterson Road and construction of a new low-water crossing, may be subject to notification under Fish and Game Code, section 1602. However, Section 1.1.3 of Appendix 3.2F describes other "projects" or activities that may be subject to Fish and Game Code, section 1602, including construction of the stormwater detention facilities, stormwater outfall, and laydown yards listed in Table 2, page 4. Section 1.1.12 describes activities related to a transmission access path that may be subject to Fish and Game Code, section 1602, including placement of fill material below the ordinary high-water mark of Patterson Run. Section 1.1.16.3 describes site preparation activities including grading and vegetation removal that also may require notification depending on the location and anticipated impacts of these activities.

In addition, the project description (Appendix 3.2F) describes certain activities that would be conducted by PG&E. Staff requests clarification about whether PG&E would conduct any activities subject to notification under Fish and Game Code, section 1602.

DR BIO-24. Please provide a clear, detailed description of all activities subject to Fish and Game Code, section 1602. Include each location where a specific activity or activities may affect Patterson Run as well as any other streams, rivers, or lakes on-site. Describe any structures that would be placed or modified in or near any stream, river, or lake including the volumes and dimensions of any materials or features that would be used or installed, and permanent and temporary impacts to the river, stream, or lake and fish and wildlife habitat for each activity.

DR BIO-25. Please clarify if PG&E would conduct activities subject to Fish and Game Code, section 1602. If this is the case, PG&E may need to submit a separate notification for these activities pursuant to section 1602 or sign onto the current notification as a co-applicant, with the understanding that PG&E and the original applicant would be jointly and severally liable for compliance with all Lake and Streambed Agreement terms and conditions and for any violations. Please submit a copy of the PG&E LSAA notification or confirmation that PG&E would be a co-applicant.

DR BIO-26. Please clarify in Section 1.1.18 of the revised LSAA notification, whether any operations and/or repair and maintenance as well as decommissioning activities are expected to impact Patterson Run and/or any other streams, rivers, or lakes on-site. The applicant would need to submit a separate notification for

decommissioning activities that would occur near the end of the project's operational term if these activities are expected to impact Patterson Run and/or any other streams, rivers, or lakes.

Section 1.1.20, Box 11, of the LSAA Application (Appendix 3.2F) describes a "swale-like area" along the gen-tie alignment at the southwest corner of the PG&E substation, and states that the area "did not contain hydric soils, vegetation, or hydrology and, thus, is not a jurisdictional aquatic resource." This section references impacts mostly in relation to Waters of the United States. Fish and Game Code, section 1602 is not limited to Waters of the United States, but instead requires notification to CDFW prior to conducting specified activities that may affect the "bed, channel, or bank" of a river, stream, or lake. Determining whether a particular activity will affect the "bed, channel, or bank" of a river, stream, or lake such that notification is required involves a case-specific inquiry that accounts for the physical nature of the site, the specific proposed activity, relevant scientific principles, and relevant case law interpreting Fish and Game Code, section 1602. A lack of indicators such as hydric soils and specific vegetation types may not be sufficient to determine whether an activity is subject to Fish and Game Code, section 1602, and certain activities in areas that do not have perennial flow may be subject to section 1602. (*People v. Weaver* (1983) 147 Cal.App.3d Supp. 23, 32.)

DR BIO-27. Please clearly identify all activities that are subject to the Fish and Game Code, section 1602 notification requirement and identify any foreseeable impacts (permanent and temporary) from these activities, including impacts to the flow, bed, channel, or bank of any river, stream, or lake (as these terms are understood under Fish and Game Code, section 1602). If there is ambiguity about whether a particular activity is subject to the notification requirement (which may include activities that impact the "swale-like area"), also include in the notification a detailed description of the activity and its potential impacts to the flow, bed, channel, and/or bank of any river, stream, or lake to enable accurate assessment of the applicability of Fish and Game Code, section 1602 to that activity.

As stated above, Section 1.1.20, Box 11, of the of the LSAA Application (Appendix 3.2F) describes several proposed "projects", including improvements to an existing culvert under Patterson Road, construction of a new low-water crossing, and construction of a stormwater outfall. The crossing includes minor grading to the bed and banks of a feature and placement of rip-rap. However, design plans are only provided for the stormwater outfall and low-water crossing. Staff requests a detailed description and design plans for each activity that requires notification under Fish and Game Code, section 1602.

DR BIO-28. Provide a detailed description and design plans for each activity that requires notification under Fish and Game Code, section 1602, including acres of temporary and permanent impacts to the bed, banks, and/or channel any river, stream, or lake.

The LSAA notification (Appendix 3.2F) provides analysis of impacts to special-status species and habitat through reference to the Biological Resources Technical Report, included as Appendix C of the LSAA Application, but this analysis describes impacts from the entire project under review by the CEC as part of the opt-in application, instead of focusing on impacts from the activities subject to notification under Fish and Game Code, section 1602. This analysis is also limited to special-status species however requirements under Fish and Game Code, sections 1600 et seq., pertain to substantial adverse impacts to all existing fish and wildlife resources from activities subject to notification under Fish and Game Code section 1602 (Fish and & G. Code, § 1602(a)(4)).

DR BIO-29. Please include in the revised LSAA notification a focused biological study that only addresses impacts from the activities subject to notification under Fish and Game Code, section 1602. Please include a habitat assessment, that describes the types of habitat, such as stream, wetland, riparian or other habitat types where activities subject to Fish and Game Code, section 1602 would occur and could be impacted by project activities. The assessment should provide information for staff, in coordination with CDFW, to determine which fish and wildlife resources those habitat types would support and could be substantially adversely affected by project activities.

DR BIO-30. Please include in the revised LSAA notification a description of impacts (permanent and temporary) to all existing fish and wildlife resources and associated habitat and vegetation for each project activity subject to Fish and Game Code, section 1602 and include proposed measures to protect these resources.

In Section 1.1.20 and Table 8, on page 24, of the LSAA Application (Appendix 3.2F), which addresses BOX 11 – Project Impacts, the estimated permanent impact area to Patterson Run would be 26,136 square feet. This value is equal to 0.6 acre, which is greater than the area of Waters of the State identified as being within the study area in the Biological Resources Technical Report, included as Appendix C in the LSAA notification. As stated above, several activities and “projects”, as defined by CDFW above, related to the culvert appear to be proposed in the notification, and it is unclear which of these activities were accounted for in the Table 8 impacts assessment. As noted above, Fish and Game Code, section 1602 is not limited to Waters of the United States and the notification must identify foreseeable permanent and temporary impacts to the flow, bed, channel, or bank of any river, stream, or lake.

DR BIO-31. Please provided clarification on how the overall impact area in Table 8 of the LSAA notification was determined. Please include specific impact amounts for each activity in the revised LSAA notification.

In Section 1.1.23 of the LSAA Application (Appendix 3.2F), which addresses Box 12C – Mitigation, the application describes proposed mitigation associated with the preservation of upland and dispersal habitat for California tiger salamander and San

Joaquin kit fox, both CESA listed species. Please note that an LSAA does not provide take coverage for listed species. As noted above, the impacts assessment and proposed protective measures should focus on project activities subject to notification under Fish and Game Code, section 1602 and should account for anticipated impacts from these project activities on all existing fish and wildlife resources, not just CESA listed species. An ITP issued under Fish and Game Code, section 2081(b) for this project would require compensatory mitigation and other measures to minimize and fully mitigate all impacts of the proposed taking of CESA listed and candidate species. Staff, in coordination with CDFW, recommends that the notification include measures necessary to protect existing fish and wildlife resources that may be impacted by activities subject to notification under Fish and Game Code, section 1602, including mitigation for impacts to associated habitats and vegetation, as appropriate.

DR BIO-32. Please revise the LSAA notification to include measures necessary to protect existing fish and wildlife resources that may be impacted by activities subject to notification under Fish and Game Code, section 1602, including mitigation for impacts to associated habitats and vegetation, as appropriate. Include a proposed mitigation and monitoring plan for the mitigation site to monitor compliance with the minimization and mitigation measures and the effectiveness of the measures.

Temporary Impact Revegetation and Restoration Plan

In Appendix 1L, the Temporary Impact Revegetation and Restoration Plan (TIRRP) (TN 258256), Section 1.1, page 1, paragraph 2, and Section 1.2 it is unclear regarding the total project acres. Additionally Figure 1 and Figure 2 Aerial do not provide the acres in the legend.

DR BIO-33. Please revise Figures 1 and Figure 2 in Appendix 1L to include the anticipated total project area (Project Boundary) acres in the legend.

Section 1.3, of the TIRRP, on page 3, paragraph 2 discusses the objective of the on-site restoration, the goals of the restoration/revegetation project and the proposed revegetation activities within 6.7 acres of wild oats and annual brome grassland. Staff needs information as background that would be incorporated into a revised TIRRP, as applicable.

DR BIO-34. Please describe whether any special-status species such as California tiger salamander have the potential to occur within the grassland restoration areas and reference which avoidance, minimization or mitigation measures proposed in Section 3.2.5.1 of the application or Section 3.3.1 of Appendix 3.2A would be implemented to avoid or reduce impacts to special-status species during ground-disturbing restoration activities. Please include any additional mitigation measures that are proposed for restoration activities.

DR BIO-35. Please provide specific acres for each vegetation and land cover area shown in Figure 3, in Appendix 1L, including Project Boundary, the PG&E Temporary Work Area, Tension Pulling Area as well as Aquatic Feature, *Avena* spp. – *Bromus* spp. Herbaceous Semi- Natural Alliance, Disturbed Habitat, and Urban/Developed.

In Section 3 of the TIRRP, on page 7, paragraph 1 and Section 3.2.4, page 9, paragraph 1, the proposed Implementation Plan states that following construction and prior to installation of revegetation materials, "soil compaction will be alleviated through ripping of the top 12 inches of soil with ripping shanks spaced no further than 24 inches apart". This action has the potential to result in take of California tiger salamander and staff, in coordination with CDFW, requests that the application include potentially feasible alternatives to ripping the soil.

DR BIO-36. Please include feasible alternatives to ripping the soil. If ripping the soil is necessary, please provide avoidance, minimization or mitigation measures proposed to be implemented to avoid or reduce impacts to special-status species during ground-disturbing restoration activities. Examples of appropriate minimization measures include pre-construction surveys conducted by a designated biologist prior to ground disturbance, installation of California tiger salamander exclusion fencing to ensure that individuals do not enter the revegetation site, and daily monitoring of the exclusion fence until all revegetation activities are complete.

In Section 3.3 of the TIRRP, the revegetation areas are shown on Figure 4 on page 40, but the figure lacks the estimated acres in the legend for each of the following: Project Boundary, Temporary Impact Revegetation Area, and Native grassland seed mix application.

DR BIO-37. Please revise Figure 4 to include specific acreages for each of the following: Project Boundary, Temporary Impact Revegetation Area, and Native grassland seed mix application.

Nesting Bird Management Plan

In Subsection 3.2.5.1, the applicant proposed mitigation measure, MM-BIO-5, which would require one avian nesting survey be conducted within 72 hours prior to starting construction work during the nesting season. However, one survey is not sufficient to determine presence or absence of nesting birds. Staff in coordination with CDFW, recommend surveys for raptors that include at least four visits to the project area during the nesting season. For passerines, two pre-construction surveys should be done within 7 days and either 48 or 24 hours prior to the start of construction.

DR BIO-38. Please include a revised pre-construction survey protocol that is based on staff's recommendations for nesting birds.

DR BIO-39. Please submit a proposal for pre-construction surveys and include species specific protocol-level surveys for special status species, such as golden eagle or western burrowing owl.

Subsection 2.3 of Appendix 1H, includes proposed mitigation measure, MM-BIO-6 (a), which states that "(i)f nesting golden eagles are determined to be present within the Study Area or within 0.5 miles of the Study Area during construction of the Project, work should be conducted outside of the nesting season (February 1 to September 1). However, MM-BIO-5 (a) only requires a nesting bird survey to be conducted "within 500 feet of all impact areas". Furthermore, golden eagles in California initiate courtship in territories in mid to late December, therefore, the nesting season should be revised to start in mid-December rather than February 1.

DR BIO-40. Please provide clarification on how it would be determined whether nesting golden eagles are present within 0.5 mile of the project site, if surveys are only proposed to be conducted within 500 feet of all impact areas. Provide clarification on the survey window to account for the nesting season for golden eagles beginning in mid-December.

In Subsection 2.3 of Appendix 1H, MM-BIO-6 (b) and Table 1, page 12, the applicant proposed establishment of a minimum buffer of 250 feet for active golden eagle nests. Golden eagles are designated as fully protected species in Fish and Game Code section 3511(b)(7) and are particularly sensitive to nest disturbances. The buffer of 250 feet for golden eagle nest in MM BIO-6 (b) conflicts with buffer of 500 feet in MM BIO-5 (d). Although, the standard buffer for golden eagles should not be smaller than a standard buffer for other raptors and owls, the proposed buffer of 500 feet is still too small.

DR BIO-41. Please revise MM-BIO-6 to increase the size of the golden eagle nest buffer to a minimum of 0.5 mile and up to 2 miles.

As noted previously, golden eagle is a fully protected species for which staff, in coordination with CDFW, cannot authorize take under an ITP unless the project meets the conditions and requirements set forth in Fish and Game Code section 2081.15. See **DR BIO-2** that requests additional information to explain whether and how the project may qualify for issuance of a fully-protected species ITP.

DR BIO-42. Please include measures in a revised MM-BIO-6 that would ensure golden eagle would be avoided (i.e., no take of golden eagle would occur), if the project would not comply with section 2081.15 ITP issuance criteria.

In Section 5 of Appendix 1H, the application states that "(n)est failures that occur will be reported in the Nest Management Log. Nest failures that appear to be the direct result of the construction activity will be reported within 48 hours of discovery, via phone call and/or email to the appropriate agency contacts." Please note that if an active nest with eggs or young belonging to a species that is listed as a candidate,

threatened, or endangered pursuant to the CESA is disturbed due to project activities without prior incidental take authorization, and nest abandonment, failure, or loss of reproductive effort occurs, may be considered a take in violation of CESA. Similarly, nest disturbance for a species listed as fully protected without prior incidental take authorization may be a violation of Fish and Game Code section 3511; and nest disturbances for any birds may be violations of Fish and Game Code sections 3503 and/or 3503.5. Staff, in coordination with CDFW, recommends that take coverage be requested for CESA-listed or candidate and fully protected species if it is anticipated that sufficient protective buffers cannot be established between an active nest and the project impact area and take cannot be avoided.

DR BIO-43. Please consider applying for take coverage for CESA-listed or candidate and fully protected species if it is anticipated that sufficient protective buffers cannot be established between an active nest and the project impact area and take cannot be avoided and submit a revised ITP application If the applicant does not consider take coverage warranted for specific species, then please explain.

General Biological Resources

California Code of Regulation, title 20, section 1877(d), Appendix B (a) (13) (A) requires a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) be submitted as part of the application. The applicant submitted Figure 3.2-C in Appendix 3.2 (Confidential) and Figure 3.2-4 in Section 3.2, at the incorrect scale. Figure 3.2 (Confidential) was submitted as 1-inch equals 6,000 feet. Figure 3.2-4 was submitted as 1-inch equals 10,000 feet.

DR BIO-44, Please provide a revised Figure 3.2 (Confidential) detailed at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under confidential cover). Please ensure the map legend clearly identifies species.

DR BIO-45. Please resubmit Figure 3.2-6 at a scale of 1:350,000 (for public viewing).

In Section 3.1, Air Quality, of the opt in application, the applicant proposes to install one 200-horsepower emergency diesel generator. California Code of Regulation, title 20, section 1877(d), Appendix B (g) (13) (B) (ii) requires nitrogen deposition modeling to determine deposition rates and location.

DR BIO-46. Please provide the following:

a. Aerial map of the isopleth graphic depicting modeled nitrogen deposition rates per Appendix B (g) (13) (B) (ii). The geographical extent of the nitrogen deposition map(s) should include the entire plume from the source and a radius of 6 miles from the project site, specifically identifying acres of sensitive habitat(s) within each isopleth. Please provide modeling parameters and files.

Please provide the GIS shapefiles.

b. Perform nitrogen deposition modeling including the complete citations for references used in determining deposition rates and locations, per Appendix B (g) (13) (C) (ii).

c. Amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition.

d. Description of habitat and species potentially affected.

e. Provide an impact discussion, specifically addressing impacts to sensitive species habitat, per Appendix B (g) (13) (E).

DR BIO-47. The header in the Lake and Streambed Alteration Application included as Appendix 3.2F is labeled "Fountain Wind Project" throughout the document. Please submit a revised Appendix 3.2F with all relevant data request responses incorporated and ensure that all information pertain to the Potentia-Viridi Battery Energy Storage Project (24-OPT-04) and is labeled correctly.

Figure 3.2-7 in Section 3.2 is not at the appropriate scale.

DR BIO-48. Please provide a map of the wetland delineation at a scale of 1:2,400 or 1-inch equals 200 feet.

California Code of Regulation, title 20, section 1877(d), Appendix B (g) (13) (B) (iv) requires the applicant provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources. The applicant provided GIS shapefiles via Kiteworks as part of the application, however, datasets were missing from the GIS shapefiles.

DR BIO-49. Please submit the GIS shapefiles to include the missing datasets for Figures 3.2-5, 3.2-6, 3.2-7, in Section 3.2 and Figure 3 for CUL-01 (culvert) included in Appendix A of the Biological Technical Report (Appendix 3.2A). The missing datasets includes Project Study Area shown in Figure 3.2-6, Project Boundary shown in Figure 3.2-7, Vegetation Cover Types shown in Figure 3.2-5, and Control Points shown in Figure 3.

The application did not include CNDDB forms or a CNDDB data table however special status plant and wildlife species were encountered during surveys.

DR BIO-50. Please provide copies of all California Natural Diversity Database (CNDDB) forms completed for species listed by a state or federal agency and other special status species encountered during project surveys. This submittal may be in the form of a data table since CDFW has transitioned to an online CNDDB field survey form. The CNDDB Data Submission Template is available at https://wildlife.ca.gov/Data/CNDDB/Submitting-Data#44524421-digital-data.

In Section 3.2 Biological Resources of the opt in application (TN 258197), Table 3.2-1 in Subsection 3.2.1.5, lists all surveys performed however it does not clearly indicate which biologist was responsible for what portion, in part or totality, of surveys listed. CEC staff, in coordination with other resource agencies, need to determine whether the biologists who performed the survey were qualified to conduct a specific survey. The resumes provided in Appendix 3.2B (TN 258062) do not provide sufficient detail to verify the qualifications of the biologists to perform specific surveys. The resume for Lorna Haworth was not provided in Appendix 3.2B. The resumes for Laura Burris and Elliot Maldonado were included but were not listed in Table 3.2-1.

DR BIO-51. Please revise Table 3.2-1 to include the full name of each biologist. If their resume was not provided, please provide their resume. See **DR BIO-53**.

DR BIO-52. Please revise Table 3.2-1 to indicate which biologists performed which survey or jointly performed a survey, for the project. Please indicate if there was a lead biologist for the survey.

DR BIO-53. Please revise the biologists' resumes to indicate the amount of time spent performing specific surveys/monitoring (e.g., hours/days) or the time period served on each project, if not already provided.

Table 3.2-1, in Subsection 3.2.1.5, lists "MB/ECF" as the biologists responsible for conducting the wetland delineation survey on January 18, 2024. Biologists' initials were identified as "MB" for biologist Mikaela Bissell and "ECF" for biologist Erin Fisher-Colton. Mikaela Bissell's certification training is listed as "in progress" as of April 2024. Staff requires more information to determine if the biologists were qualified to perform specific surveys.

DR BIO-54. Please verify who performed the wetland delineation and provide proof of appropriate wetland delineation training and certification that is dated prior to completion of the survey conducted on January 18, 2024.

DR BIO-55. Please clarify which biologists were responsible for completing the Ordinary High Water Mark (OHWM) datasheets in Appendix F of Appendix 3.2 D (TN 258199). The initials listed on the form "MRB" do not match the "Personnel" footnote included on Table 3.2-1.

California Code of Regulation, title 20, section 1877(d), Appendix B (g) (13) (D) (i) requires that prior to conducting protocol level surveys, the applicant shall consult with state and federal agencies for field survey protocol guidance prior to surveys if a protocol exists. There is no documentation that the relevant agencies were consulted prior to conducting protocol surveys.

DR BIO-56. Please provide any communications the applicant had with the relevant state and federal agencies with jurisdiction over wildlife resources (e.g., CDFW and U.S. Fish and Wildlife Service (USFWS)) in the project area. Please provide copies of

all communications with the agencies as part of preparation of the opt in application. Please provide the name, title, phone number, address (required), and email address (if known), of the official who was contacted.

In Appendix F of Appendix 3.2 D, the applicant provided an OHWM data sheet completed by the biological resources consultants for an ephemeral feature present on the project site (EPH-1), however the application states there are no wetlands present in the project area. Staff cannot confirm the presence or absence of wetlands without additional information which includes providing the wetland delineation form(s) for all potential wetland features onsite.

DR BIO-57. Please provide the completed U.S. Army Corps of Engineers wetland delineation form(s) for any water bodies that may be impacted and potentially considered federal or state jurisdictional wetlands, including full name of biologist conducting the delineation and resumes (if not already included). See also **DR WATER-7**.

DR BIO-58. Please include a comprehensive discussion, beyond what was provided on p. 3.2-27 of Section 3.2, evaluating the effectiveness of the mitigation and avoidance measures with respect to cumulative impacts.

Section 3.2.5.1 of the application, pages 3.2-28 to 3.2-31, does not include proposed mitigation measures MM-BIO-7 through MM-BIO-11. However, these mitigation measures are referenced in Subsection 3.2.3.2, pages 3.2-20 to 3.2-22.

In addition, in Subsection 3.3.1 of Appendix 3.2 A, Biological Technical Report, the applicant proposed to implement avoidance and mitigation measures (AMMs) that would be in compliance with the EACCS. However, these AMMs were not included in the discussion Subsection 3.2.3.2 or the measures in Subsection 3.2.5.1. Specifically, the following AMMs were included in in Subsection 3.3.1 of Appendix 3.2 A but not included in Section 3.2.5.1: AMPH-1 and MAMM-1. In addition, BIRD-3 from the EACCS was not included in the proposed mitigation and may apply the project.

DR BIO-59. Please update Section 3.2.5.1 of the application to provide a complete list of mitigation measures proposed by the applicant for biological resources that includes all measures discussed in Subsection 3.2.5.1 as well as Subsection 3.2.3.2 of Appendix 3.2A, including AMPH-1 and MAMM-1. Please include BIRD-3 from the EACCS or discuss why this measure was not included. Please include a discussion of all proposed avoidance and mitigation measures in a revised Subsection 3.2.3.2.

Section 3.2 of the application and Biological Resources Technical Report (Appendix 3.2) (TN 258200) both state the project would provide compensatory mitigation with "acquisition of credits from existing mitigation banks and other compensatory mitigation." Section 3.2 of the application and Appendix 3.2A, along with the ITP application, included in Appendix 3.2E, rely on a determination of appropriate mitigation

credits using a formula included in the EACCS document in Chapter 3. This document is available at: https://www.eastalco-conservation.org/documents.html. Based on coordination with CDFW these formulas may not be appropriate for this project.

DR BIO-60. Please discuss options for "other compensatory mitigation" in detail, including but not limited to alternative approved mitigation banks, options under consideration other than mitigation banks and any necessary monitoring. Please coordinate with CEC staff as well as the other resources agencies (e.g., USFWS and CDFW) to determine if the EACCS mitigation ratio calculation would be an acceptable way to calculate mitigation that would be required.

Section 3.2 included a draft pamphlet and PowerPoint presentation in Appendix 1G but did not include a discussion of an educational program to enhance employee awareness during construction and operation to protect biological resources.

DR BIO-61. Please provide a discussion of the educational program to enhance employee awareness during construction and operation to protect biological resources.

The proposed project has the potential to affect multiple special status species, including, but not limited to, those species included in the ITP application (Appendix 3.2 E). This includes big tarplant (*Blepharizonia plumosa*), which was detected in the during surveys near the Tesla Substation. Although a Nesting Bird Management Plan (Appendix 1H) was included in the application, the applicant should discuss all other plans for monitoring that may be needed to ensure compliance with and effectiveness of proposed mitigation measures and or discuss why other monitoring is not necessary to satisfy California Code of Regulations, title 20, Appendix B (g) (1) and Appendix B (g) (13) (G).

DR BIO-62. Please provide a discussion of all proposed monitoring plans to ensure compliance with and effectiveness of impact avoidance and mitigation measures as required. This includes discussing the Temporary Restoration and Revegetation Plan (Appendix 1L) as well as plans for monitoring for special status species including but not limited to big tarplant, golden eagle, western burrowing owl, and San Joaquin kit fox. These species may warrant development of additional monitoring plans. This would include plans for pre-construction surveys, flagging known locations, establishing buffers and monitoring during construction for rare plants, such as big tarplant.

DR BIO-63. Please provide copies of all correspondence along with meeting notes with regulatory agencies regarding permitting issues or other relevant topics and include the name of officials contacted within each agency.

Section 3.2.6 of the application provides a description of applicable laws, ordinances, regulations, and standards (LORS) but does not discuss conformance with each of the

LORS. The table or matrix shall explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed in accordance with California Code of Regulations, title 20, Appendix B (i) (1) (A).

DR BIO-64. Please update Table 3.2-4 in Section 3.2 to include the page numbers where the application discusses conformance with each LORS.

California Code of Regulations, title 20, Appendix B (i) (1) (B) and (i) (2) requires contact information for all agencies affiliated with biological resources, including U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB), and that a schedule be provided for all permits outside the authority of the CEC. Table 3.2-5 in Subsection 3.2.8 and Subsection 3.2.7 did not include this information.

DR BIO-65. Please provide the name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for CEC staff.

DR BIO-66. Please provide a schedule indicating when permits outside the authority of the CEC will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

Biological Technical Report

Appendix G of Biological Technical Report (Appendix 3.2A) and Table 7 in the ITP application (Appendix 3.2E), provide proposed mitigation ratios and acreages for each species based on the EACCS compensatory mitigation calculation methods.

The ITP application used the EACCS to determine mitigation ratios, however the EACCS score sheets are not an appropriate method for calculating compensatory mitigation for a mitigation bank. CDFW accepts the ratio tables for mitigation banks. If the applicant plans to use the EACCS to determine compensatory mitigation, then the correct ratio tables provided in EACCS need to be used. In addition, staff, in coordination with CDFW, determined the score sheets used for California red-legged frog and California tiger salamander were incorrect.

The Biological Technical Report includes the results of habitat assessments for California tiger salamander and California red-legged frog (*Rana draytonii*) per USFWS guidelines. However, the application did not include any documentation regarding coordination with the USFWS.

DR BIO-67. Please provide documentation that the site assessment report for California tiger salamander was sent to USFWS. Also, provide documentation from USFWS regarding recommendations for conducting field surveys for California tiger salamander and California red-legged frog. Please provide documentation that all

the necessary data and supporting documentation was sent to USFWS for California red-legged frog.

DR BIO-68. Please revise and submit the Mitigation Score Sheets (Appendix G of the Biological Technical Report) included in the ITP application using the correct mitigation ratios. Please contact CEC staff and CDFW for guidance and assistance in completing this task.

DR BIO-69. Please specify whether the biologists that prepared the California Red-legged Frog Habitat Assessment Data Sheets in Appendix F of the Biological Technical Report had any prior experience with this process. Please provide clarification on past experience with the EACCS and the qualifications for the biologists who filled out the Mitigation Score Sheets (Appendix G of the Biological Technical Report) included in the ITP application.

DR BIO-70. Please submit a copy of EACSS ratio table used to determine compensatory mitigation and indicate which ratio was used from the table and provide the reasoning for using that ratio.

In Subsection 5.4.2.2, it states that California red-legged frog "has a moderate potential to occur," and later contradicts this saying "habitat on the PSA [project survey area] is suitable upland refuge and dispersal habitat." Additionally, Table E-1 (Appendix E of Biological Technical Report) states California red-legged frog has a high potential to occur as there are "abundant suitable grassland habitat with small mammal burrows present on the PSA with aquatic breeding habitat available within dispersal distance." One of the aquatic features within the PSA, Pond 2, was also assessed to "provide high-quality breeding habitat for CRLF [California red-legged frog], consisting of a large, deep stock pond with perennial water and a large quantity of emergent vegetation."

DR BIO-71. Please address these discrepancies in Subsection 5.4.2.2 and provide an impact analysis that includes assessment of potential impacts to breeding habitat and critical habitat in the project area, and justify how the current proposed mitigation measures for the project will be sufficient to avoid take of the California red-legged frog. Otherwise, provide additional avoidance, monitoring, and mitigation measures to avoid take of California red-legged frog. Please also provide any relevant information regarding the status of the Section 7 consultation between USACE and USFWS. See **DR-BIO-74**.

Section 6 of the Biological Technical Report states the PSA is in Conservation Zone (CZ) 10 of the EACCS and that this CZ has "conservation priorities that may conflict with the Project implementation, such as protection of all big tarplant occurrences, protection of critical habitat for California red-legged frog (including annual grasslands near ponds), and protection and restoration of Patterson Run."

DR BIO-72. Please explain in more detail how the applicant intends to ensure that the proposed project would not impact these species or be in conflict with the EACCS by explaining how impacts to big tarplant, California red-legged frog, and Patterson Run would be avoided and/or mitigated.

Section 5.4.2.5 of the Biological Technical Report (Appendix 3.2A) discusses western burrowing owl (*Athene cunicularia*) and states, "burrows present on the site were generally small and not suitable for burrowing owls. Higher-quality habitat with low, grazed vegetation and ground squirrel colonies were observed throughout the surrounding landscape." Burrowing owls are known to be less sensitive to construction related activities and may utilize pipes or culverts in construction areas. This species has been documented to travel up to 7 miles between breeding sites. Suitable burrows associated with ground squirrel colonies are known to exist in the immediate area surrounding the project site. This species is currently under consideration for listing as a candidate species under CESA.

DR BIO-73. Please include a proposal for pre-construction surveys for western burrowing owl that follows the *CDFW Staff Report on Burrowing Owl Mitigation* (2012) guidance document for this species as well as any other avoidance and minimization measures proposed for this species and provide in a draft burrowing owl mitigation and monitoring management plan. The plan should provide details on how the project would avoid, minimize and fully mitigate impacts to western burrowing owl.

Subsection 3.2.1.3.2 of the application discusses critical habitat for California red-legged frog and specifies that all components of critical habitat are located in the project site and the dispersal distance (i.e., one mile of the project site). However, it it is not clear if the aquatic resources onsite were analyzed for suitability for California red-legged frog.

DR BIO-74. Please clarify whether Patterson Run contains any potentially suitable aquatic breeding or non-breeding habitat for California red-legged frog.

Subsection 3.2.1.5 of the application notes that protocol-level rare plant surveys were conducted on May 16 and August 2, 2023, and April 12 and June 17, 2024. Two special-status plant species considered as potentially occurring in the project area, diamond-petaled California poppy (*Eschscholzia rhombipetala*) and caper-fruited tropidocarpum (*Tropidocarpum capparideum*) have very short blooming periods (March to April). If these species bloomed early in spring 2024, it is possible that the April 12, 2024, survey may have missed detection of the species.

DR BIO-75. Please provide any measures that were taken to confirm if diamond-petaled California poppy and caper-fruited tropidocarpum would likely be evident and identifiable during the survey period, if present. This includes visiting a nearby reference population to confirm blooming. Please provide dates and general location of the reference population, as well as who visited the sites, and include a resume, if

not previously provided.

Nationwide Permit Pre-Construction Notification Supplemental Information

In Sections 1 and 2 of the USACE Nationwide Permit Pre-Construction Notification included as Appendix 3.2D (TN 258199), the application states that two components of the proposed project would affect Waters of the U.S. The applicant anticipates mitigation would not be required by USACE but does expect it to be required by USFWS, pursuant to the Endangered Species Act (ESA). The Biological Assessment, included in Appendix 3.2D (TN 258199), includes an assessment of impacts to California tiger salamander, California red-legged frog, and San Joaquin kit fox, all federally-listed species, and the applicant determined that the project "may affect, [is] likely to adversely affect" these species.

DR BIO-76. Section 2 of Appendix 3.2D states that "mitigation outlined in EACCS is expected to be required by USFWS and is expected to include wetlands and/or waters to offset impacts to aquatic features". Please identify the specific mitigation from the EACCS that USFWS is likely to require.

DR BIO-77. Please include all avoidance, minimization, mitigation, and monitoring measures for California tiger salamander, California red-legged frog, and San Joaquin kit fox (e.g., pre-construction surveys for San Joaquin kit fox).

DR BIO-78. Table ES-1 in the Biological Assessment, included as Appendix D in Appendix 3.2D, identifies impacts on federally listed species with permanent and temporary acreage listed for California tiger salamander, California red-legged frog, and San Joaquin kit fox. Please demonstrate how the acres were calculated and specify how the applicant would use these acreages in determining compensatory mitigation.

In Section 3 of Appendix 3.D, the applicant states that they requested "that USACE initiate consultation with USFWS, pursuant to Section 7 of the Endangered Species Act."

DR BIO-79. Please confirm if the Nationwide Permit Pre-Construction Notification Supplemental Information has been submitted to the USACE. Please provide any correspondence from USACE and/or USFWS regarding this consultation process, as well as a copy of the Section 404 permit application and Engineering Form 6082, referenced in Appendix 3.2D. Please see **DR BIO-66** and **DR WATER-7**.

CULTURAL AND TRIBAL CULTURAL RESOURCES

DR-CUL/TRI-1. The California Energy Commission siting regulations require a "list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference." (Cal. Code Regs. tit. 20 §§ 1704(a)(3)(C), 1877(a).) Appendix 3.3A cites five sources of information without providing a full bibliographic entry for them.

Please provide bibliographic entries for: CASQA (2019), Dudek (2021), OHP (1995), Williams (1997), and WRCC (2023).

DR CUL/TRI-2. Opt-in applications must include copies of California Department of Parks and Recreation (DPR) 523 forms for all cultural resources (ethnographic, architectural, historical, and archaeological) identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines (36 CFR 60.4(g) per Cal. Code Regs. tit. 20, Appendix B (g) (2) (B)).

Please provide copies of the DPR 523 forms for the following cultural resources:

- P-39-000098
- P-39-004332
- P-39-005337
- P-01-000154
- P-01-000155
- P-01-001783
- P-01-010498
- P-01-010499
- P-01-010500
- P-01-010503
- P-01-010504
- P-01-010505
- P-01-010506
- P-01-010507
- P-01-010508
- P-01-010614
- P-01-010947
- P-01-010948
- P-01-010949
- P-01-010950
- P-01-011394
- P-01-011395
- P-01-011477
- P-01-011479
- P-01-011480
- P-01-010481
- P-01-011482
- P-01-012147

DR CUL/TRI-3. Opt-in applications must provide copies, in pdf format, of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project under California Code of Regulations, Appendix B, section (g) (2) (C) or which report on any archaeological excavations or architectural surveys within the literature search area (Cal. Code Regs. tit. 20, Appendix B(g)(2)(B)).

Please provide these studies from within the project area:

- S-000848
- S-002458
- S-002865
- S-009462
- S-009795
- S-011826
- S-012790
- S-016660
- S-017835
- S-018217
- S-020395
- S-024986
- S-030204
- S-032596
- S-033239
- S-033545
- S-033600
- S-048927
- S-052105

Please provide technical reports from within a quarter mile of the area surveyed for the project, or that report on architectural surveys: S-035796, S-043682, S-052299, and SJ-05528.

DR CUL/TRI-4. The application states that the pedestrian survey was of the Area of Potential Impacts (API) only. Please clarify whether the API incorporated an area extending to no less than 200 feet around the project site, and to no less than 50 feet to either side of the right-of-way of project linear facility routes per California

Code of Regulations, title 20, Appendix B (g) (2) (C).

The project boundary map in Section 2 (Figure 2-3) of the application is significantly larger than the map of the API (Appendix 3.3 Figure 3). All areas that have the potential for ground disturbance need to be surveyed, including staging areas and access roads. Please explain why the project boundary map (Figure 2-3) and the API map (Appendix 3.3 Figure 3) differ. If the project has expanded since the archaeological survey, the added area needs to be surveyed with a 200-foot buffer. (Cal. Code Regs. tit. 20, Appendix B (g) (2) (C).) The results of any additional surveys need to be incorporated into a Data Completeness Supplement and an addendum to the technical report and submitted.

DR CUL/TRI-5. Please conduct a historic architecture field survey no less than 0.5 mile out from the proposed project site and from routes of all above ground linear facilities (Cal. Code Regs. tit. 20, Appendix B (g) (2) (C)). The results of these additional surveys need to be incorporated into a Data Completeness Supplement and an addendum to the technical report and submitted.

DR CUL/TRI-6. Please include the professional qualifications for Gregory Wada and Victoria Martin, who conducted the pedestrian survey (Cal. Code Regs. tit. 20, Appendix B (g)(2) (C) (v)).

DR CUL/TRI-7. Opt-in applications must include a copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC. (Cal. Code Regs. tit. 20, Appendix B (g) (2) (D)). The applicant's request to the NAHC is not provided in the application. Please provide a copy of the NAHC request.

DR CUL/TRI-8. Please provide a copy of all correspondence the applicant sent to those individuals listed on the NAHC Contact List and copies of all responses, including a written summary of oral responses as required by California Code of Regulations, title 20, Appendix B (g) (2) (D).

DR CUL/TRI-9. Section 3.3.7 of the application provides a description of applicable laws, ordinances, regulations, and standards (LORS). Please provide a table of LORS with a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed in accordance with California Code of Regulations, title 20, Appendix B (i) (1) (A).

DR CUL/TRI-10. Section 3.3.9 of the application states that no permits are required. However, section 3.3.7.1 of the application states that a Section 404 permit from the Army Corps of Engineers is anticipated and consultation will be

initiated to ensure that permit processing is completed in accordance with the requirements of Section 106 of the National Historic Preservation Act. If a Section 404 permit is anticipated, please provide a table with an updated list identifying agencies, jurisdictions, etc., in accordance with California Code of Regulations, title 20, Appendix B (i) (1) (B).

DR CUL/TRI-11. If the Section 404 permit is anticipated, please provide phone numbers and titles for agency contacts in accordance with California Code of Regulations, title 20, Appendix B (i) (2).

DR CUL/TRI-12. If the Section 404 permit is anticipated, please update the schedule on page 3.3-20 of the application, in accordance with California Code of Regulations, title 20, Appendix B (i) (3).

EXECUTIVE SUMMARY

The application includes resumes for biological and cultural resources teams but does not identify the report person(s) responsible for the subject areas.

DR ES-1. Please identify the person or persons responsible for the preparation of each principal subject area.

Appendix B (a) (1) (D) requires a full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction. A full-page photographic reproduction before construction and simulation or artists rendering of the site after construction with the project components were not provided.

DR ES-2. Please provide a full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction. This should clearly show the project site, including all project components, with existing and proposed conditions and should not be from the Patterson Pass Road vantage point. It should be a closer vantage point such as the access road entrance into the BESS facility.

Appendix 1B in the application includes the owners' mailing addresses for parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed energy storage facility and related facilities. However, it does not identify the occupants' addresses contiguous to the proposed energy storage facility, related facilities, transmission lines or other linear facilities.

DR ES-3. Please provide the direct mailing addresses for occupants of properties contiguous to the proposed energy storage facility, related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. If

the property does not have a street address and/or is not occupied, please identify it as such.

GEOLOGICAL HAZARDS

Appendix B (g) (17) (A) requires a geologic map of the area within 2 miles of the project site. Figure 3.4-1, in Section 3.4, utilized an outdated preliminary geologic map as the basemap (referenced in Section 3.4 as Dibblee 1980).

DR GEO-1. Please revise Figure 3.4-1 using a more current reference as a basemap to depict the surface geology. CEC staff suggests utilizing "Deattre, M.P. et. al 2023. Geologic and Geophysical Maps of the Stockton 30' x 60' Quadrangle, California. Joint venture between California Department of Conservation, U.S.G.S., and the Coast Range Geologic Mapping Institute" available at: https://www.conservation.ca.gov/cgs/Documents/Publications/Regional-Geologic-Maps/RGM_005/RGM_005_Stockton_100k_2023_Plate1of1_a11y.pdf.

Appendix B (g) (17) (A) requires a summary of the seismicity of the project site. Figure 3.4-2 excludes a number of pre-Quaternary faults (>1.6 million years) immediately southeast of the site between the Midway Fault and the Corral Hallow-Carnegie Fault Zone.

DR GEO-2. Please revise Figure 3.4-2 to include the pre-Quaternary faults immediately southeast of the site between the Midway Fault and the Corral Hallow-Carnegie Fault Zone. For further details, please consult the California Geological Survey (CGS) Fault Activity Map of California available at: https://maps.conservation.ca.gov/cgs/fam/.

HAZARDOUS MATERIALS HANDLING

In Section 3.5, Hazardous Materials Handling (TN 258012), page 3.5-8 of the Application mentions "including the solar PV facility".

DR HAZ-1. Please confirm that the project does not include a solar PV facility.

The Phase I Environmental Site Assessment (ESA) (TN 258064) identified historical agricultural use between approximately 1940 to the 1960s, and notes these activities may have been subject to application of pesticides and herbicides, which could contain hazardous materials. This is identified as a "business environmental risk (BER)" in the Phase I. Staff needs information to assess the potential health hazards posed to workers involved in soil disturbances during construction activities. The Soil Sampling and Analysis Plan and Management Plan is proposed to be implemented as a mitigation measure, identified in the application as MM-HAZ-1, includes testing later upon approval of the project and prior to construction, but that testing should occur now during staff's review of the application, to evaluate impacts to construction workers and categorization of soils transported off-site.

DR HAZ-2. Please prepare and implement a soil sampling plan for the project site including testing for herbicides and pesticides and CAM-17 metals per the California Administrative Manual.

Table 3.5-2 has a column for quantities, but quantities are not estimated for some of the hazardous materials (e.g., lithium-ion batteries).

DR HAZ-3. For Table 3.5-2, please provide typical quantities (estimated quantities) for each hazardous material listed.

The application contains Figure 3.5.1, in Section 3.5, which depicts the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous material. However, the scale of Figure 3.5.1 is not 1:24,000 and the application does not contain a figure depicting these items at a scale of 1:24,000.

DR HAZ-4. Please adjust the scale of Figure 3.5-1 to 1:24,000.

Subsection 3.5.3.3 does not discuss potential impacts of lithium battery fires during transportation of lithium batteries to the project site. The project would increase the potential for an accident involving lithium batteries to the project site. Recent semi-truck accidents involving lithium batteries have resulted in the shutdown of I-80 near Nyack and I-15 near Baker.

DR HAZ-5. Please discuss actions that the project could implement to reduce the probability of lithium battery fires during transportation of batteries to and from the project site and actions to reduce the impact of such fires (if they occur) to motorists.

On page 3.5-12 the discussion indicates that fire hydrants would be installed in accordance with “OCFA” standards. This acronym represents the Orange County Fire Agency, which is the incorrect fire agency/department for the project area.

DR HAZ-6. Please identify the Alameda County Fire Department requirements and clarify whether Alameda County has more stringent requirements than the 2022 California Fire Code (CFC).

No information was provided about whether any agencies or people were contacted regarding hazardous materials and any contact information if any were contacted, or who would serve as contact person for CEC staff.

DR HAZ-7. Please provide names and associated contact information for any officials/agencies that were contacted for hazardous material and hazards information related to the preparation of Section 3.9. Please provide the name of the official who will serve as contact person for CEC staff related to hazardous materials.

LAND USE

In section 3.6 Land Use of the application, subsection 3.6.1.4 states that the project site consists of vacant grazing land identified as "Grazing Land" by the Farmland Mapping and Monitoring Program (FMMP) (p. 3.6-2).

DR LAND-1. Please indicate whether there were any prior FMMP classifications of the site before it was classified as "Grazing Land".

DR LAND-2. Please confirm the grazing status of the property and provide the last year it was used for grazing.

Subsection 3.6.1.4 of the application states that the proposed BESS facility and gen-tie corridor sites (except the portion of the gen-tie owned by PG&E) have been under a Non-Prime Farmland Williamson Act contract since 1972 (p. 3.6-3). Appendix 3.6A of the application includes a copy of the Williamson Act contract for the proposed project site. Exhibit B of the Williamson Act contract lists the uses considered compatible with the contract and therefore allowed on the project site. Electric facilities are not listed as one of these uses, with the exception of an electric facility accessory to another allowed use. Battery storage is also not listed in Exhibit B, which is expected given that this technology was not in use in 1972, the year the contract was executed.

Table 3.6-1 of the project application states: *"No cancellation of a Williamson Act contract is necessary. Under the Act, electrical facilities are determined to be a compatible use, absent an express finding to the contrary".* The application refers to Government Code, section 51238, subdivision (a)(1), which states: "*Notwithstanding any determination of compatible uses by the county or city pursuant to this article, unless the board or council after notice and hearing makes a finding to the contrary, the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve".*

By operation of law, electric facilities are determined to be compatible uses with any agricultural preserve, unless the local jurisdiction has made a finding otherwise. (Gov. Code, § 51238.) The term electric facilities is not defined in Government Code, section 51201. Some local agencies interpret "electric facility" more narrowly as transmission lines supporting agricultural uses, and others interpret the definition more broadly to include electric generation and other larger facilities (Breakfield 2012).

Alameda County has not defined the term electric facility in its "Uniform Rules and Procedures Governing Agricultural Preserves and Williamson Act Contracts." The "Uniform Rules and Procedures Governing Agricultural Preserves and Williamson Act Contracts" includes the following compatible use standard: "The erection, construction, alteration or maintenance of gas, electric, water or communication utility facilities are compatible uses unless the Board of Supervisors, after notice and hearing, makes a finding to the contrary (see Gov. Code , § 51238)" (Section II.E. 1, p. 2-11). However,

as discussed earlier, Alameda County does not define "electric facility" in this document. Also, as discussed earlier, the Williamson Act contract for the project property specifically only allows electric facilities accessory to another allowed use. It should be noted that Alameda County does have a 2022 "Large Commercial Solar and Battery Storage Statement of Policy Components" which defines battery storage facilities as "electrical transmission corridor equipment" for the purposes of General Plan consistency.

The applicant states that *"Under the CEC Opt-In application process, any compatible use determination would be within the CEC's jurisdiction"* (p. 3.6-6). Although the CEC has in lieu jurisdiction over Opt-In projects, the CEC evaluates conformance with the applicable local agency's laws, ordinances, regulations, and standards to determine whether a proposed project is a compatible land use.

DR LAND-3. Please provide any evidence the applicant may have that Alameda County considers electric facilities with large footprints, such as battery storage facilities, as falling under the definition of "electric facility" discussed in Government Code, section 51238(a)(1).

DR LAND-4. Please provide any communications the applicant had with the Alameda County Agricultural Advisory Committee on this project. Please provide the name, title, phone number, address (required), and email address (if known), of the official who was contacted, and provide the name of the official who will serve as a contact person for CEC staff.

DR LAND-5. Please discuss how the project would be consistent with Government Code section 51238.1, which describes the findings needed to determine that a use is compatible with a Williamson Act contract.

DR LAND-6. Please provide the Compatible Use Determination application form and required application materials, required by Alameda County in "Uniform Rules and Procedures Governing Agricultural Preserves and Williamson Act Contracts." Include information on whether there is an existing commercial agricultural use on the property that meets the definitions in Uniform Rule 1, specifically the standards in I.C.1 and I.C.3b.

DR LAND-7. Please provide the contract term for the Non-Prime Farmland Williamson Act contract and include when the current contract term will expire and when it is due to be renewed.

References:

Alameda County 2011 – Alameda County Community Development Agency Planning Department. Alameda County Uniform Rules and Procedures Governing Agricultural Preserves and Williamson Act Contracts. Amended October 11, 2011. Accessed on August 22, 2024. Accessed online at:

https://www.acgov.org/cda/planning/generalplans/williamson_act.htm#:~:text=The%20California%20Land%20Conservation%20Act,preserving%20land%20for%20agricultural%20use.

Breakfield 2012 – Breakfield, Ashley E. "The Challenges of Developing Utility-Scale Renewable Energy Projects on Land Under Williamson Act Contracts." Farella, Braun and Martel, 9 April 2012. Accessed on August 22, 2024. Accessed online at: https://www.fbm.com/publications/the-challenges-of-developing-utility-scale-renewable-energy-projects-on-land-under-williamson-act-contracts/.

NOISE

In Subsection 3.7.1.10 (Ambient Noise Survey) and Appendix 3.7A (Noise Technical Report), ambient noise surveys were conducted for both short-term (ST-1) and long-term (LT-1 and LT-2) measurements.

The location of ST-1 was described in Table 3.7-2 (Measured Baseline Outdoor Ambient Noise Levels); however, a point location was not provided in the Figure 3 (Noise Measurement Locations, Appendix 3.7A).

LT-1 was located adjacent to Patterson Pass Road, and loud ambient noise levels were attributed to "rush hour" traffic. However, considering Patterson Pass Road is a rural road, the high noise levels recorded seem unusual. Also, the location of the "rush hour" traffic is unclear.

DR NOISE-1. Please identify the point location of ST-1.

DR NOISE-2. Please explain the reason(s) for the loud noise levels recorded at LT-1 and identify other noise sources, if any, that contributed to the noise environment at this location during early morning and evening hours. Please identify the location(s) of the "rush hour" traffic.

PALEONTOLOGICAL RESOURCES

Appendix B (g)(16)(B) requires a discussion of paleontological sensitivity of the project and adjacent areas. Section 3.8 Paleontological Resources, Subsection 3.8.1.1.1 of the application notes that older quaternary alluvium was not identified in the geologic reference, Dibblee & Minch 2006, but was mentioned in the Phase I Environmental Site Assessment, Appendix 3.5A (TN 258064). According to another geologic reference in Section 3.8 of the application, Deattre, M.P. et. al 2023, there are older pediment deposits (Qop) that could be more sensitive in terms of paleontological resources.

DR PALEO-1. Please revise subsection 3.8.1.1.1 of the application to include the more recent geologic reference provided in **DR GEO-1**, Deattre, M.P. et. al 2023, in the discussion of paleontological sensitivity. Please submit an updated Section 3.8.

Before resubmitting an updated Section 3.8, please correct the numbering of subsection 3.8.2.3 on page 3.8-4, as it appears incorrect. Also correct the subsection numbers under subsection 3.8.6, beginning on page 3.8-7 to read 3.8.6.1, 3.8.6.2, etc., instead of 3.8.5.1, 3.8.5.2, etc.

PROJECT DESCRIPTION

Figure 2-1 and Figure 2-4 in Section 2, and figures in Appendix 1A in the application show the project site but do not include adequate information regarding the county, township, range, and sections and do not include the proposed gen-tie line route.

DR PD-1. Please provide a map at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number showing the proposed final locations and layout of the energy storage facility and all related facilities, include the gen-tie line route.

Appendix 2A in the application does not provide elevation drawings of the battery energy storage facility, project substation, or the gen-tie line route.

DR PD-2. Please provide elevation drawings that identify the heights of the battery yard of the energy storage facility, all the tall structures (e.g., H-frames and poles) for the project substation and include the transmission line poles and dead end structure. Structures and heights should correspond to what has been presented in the visual simulations and Table 2-1 (Preliminary Dimensions of Major BESS Facility Components) and Table 2-3 (Preliminary Dimensions of Major Transmission Components) or specify the differences**.**

Figure 2-2 and Figure 2-3 in Section 2 of the application show the project site boundary but do not show the gen-tie line route.

DR PD-3. Please provide revised figures, Figure 2.2 (Vicinity Map) and Figure 2.3 (Project Site Aerial) that show the gen-tie route.

Section 2.5 and Appendix 2C in the application discuss decommissioning at the end of the life of the project but do not mention premature or unexpected cessation of operations.

DR PD-4. Please provide a discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.

PUBLIC HEALTH

In Section 3.9, Public Health, the applicant conducts a HARP2 Health Risk Assessment (HRA) at nearby residences during construction; however, the application does not include a map showing the locations of the sensitive receptors or offsite workers. The application does not show health risks at offsite workers or sensitive receptors other

than residences. Staff needs to better understand the receptor locations and impacts at those locations. In addition to Maximally Exposed Individual Resident (MEIR), staff will also need the locations and impacts for the Maximally Exposed Individual Worker (MEIW) receptors, the nearest School/Daycare (MESR/MEDR) and Recreational (MERR) receptors, and any other sensitive receptors near the project site (e.g., church).

In addition, the applicant did not evaluate the health risks from project operation. Staff needs these HRA results to complete the analysis of the project impacts to sensitive receptors and offsite workers.

DR PH-1. Please provide a map showing sensitive receptor locations for MEIR, MEIW, MESR/MEDR, and MERR, including the distance from the project boundary during project construction.

DR PH-2. Please provide an HRA of the project during operation to demonstrate that the project impacts to sensitive receptors (including residences) and offsite worker receptors would be less than significant. If the locations of MEIR, MEIW, MESR/MEDR, and MERR are different from those for project construction, please indicate them on the map provided for **DR PH-1**.

DR PH-3. Please provide the input data and output results, in both electronic and print formats, used to prepare the HRA.

As shown in the following summary table, staff found discrepancies between the diesel particulate matter (DPM) emissions used in the applicant's HRA in the Ambient Air Quality Analysis (TN 258061) and those estimated from CalEEMod for HRA in the emissions calculations (TN 258060). The applicant's HRA used a little more conservative emissions for the unmitigated scenario. However, for the HRA with mitigation, the applicant used DPM emission of 0.0116 tons/year for 2027, which is less than the CalEEMod estimate of 0.03 tons/year. Staff needs clarification regarding the discrepancies and an update in the HRA for construction if deemed necessary.

	Year	Unmitigated	Mitigated
DPM Emissions Used in HRA (tons/year) (page 5 of 159 of TN 258061	2027	0.17365008	0.0116
	2028	0.050002511	0.012
PM2.5 Exhaust Emissions from CalEEMod for HRA (pages 124 and 125 of 219 of TN 258060)	2027	0.16	0.03
	2028	0.05	0.01

DR PH-4. Please provide clarification regarding the discrepancies between the DPM emissions used in the HRA and those estimated from CalEEMod.

DR PH-5. Please update the HRA for construction using the actual CalEEMod outputs if deemed necessary. Please provide the input data and output results, in both electronic and print formats, used to prepare the updated HRA.

Public Resources Code section 25545.1(b)(1) provides that the issuance of a certificate by the CEC is in lieu of any local air quality permit that would have been issued from the BAAQMD (or District) and such permit requirements are incorporated into the CEC's opt-in application requirements in California Code of Regulation, title 20, section 1877(d), Appendix B (g)(8)(E) and (i), and CEC's certification. To assist CEC staff and the District in reviewing the project, the applicant should submit the necessary information to the District. To ensure the District's requirements are contained in the CEC's EIR and certification, staff needs copies of all correspondence between the applicant and the District in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

DR PH-6. Please provide tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the CEC to certify sites and related facilities.

DR PH-7. Please provide the name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for CEC staff.

DR PH-8. In Table 3.9-2, there is an incomplete entry in the far-right cell in the first row ("ficant with mitigation"). Please complete the statement for level of significance determination.

DR PH-9. Table 3.9-3 lists a maximum cancer risk of 4.49 in 1 million, while the paragraph following Table 3.9-3 lists a maximum cancer risk of 4.02 in 1 million. Please correct this discrepancy and confirm the maximum cancer risk.

DR PH-10. In Section 3.9.2.6, Summary of Effects, confirm if Table 3.9-3 replace Table 3.9-2 since the former table addresses the mitigation required to get the MICR below the BAAQMD CEQA Threshold.

SOCIOECONOMICS

California Code of Regulations, title 20, Appendix B (g)(7)(A)(iii) requires the existing and projected unemployment rate. Table 3.10-8 in Section 3.10 Socioeconomics (TN 258023) of the application provides the existing unemployment rate.

DR SOCIO-1. Provide the projected unemployment rate of the region affected by the construction and operation of the project.

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.

The information for parks and recreation facilities, and libraries was not included in the application.

DR SOCIO-2. Provide the capacities, service standards, and existing and expected use levels of parks and recreation facilities, and libraries.

California Code of Regulations, title 20, Appendix B (g)(7)(B)(v) requires the application include the potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities.

The response times to hospitals and for police protection, fire protection, emergency services, parks and recreation, and libraries was not included in the application.

DR SOCIO-3. Provide the response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities and libraries.

California Code of Regulations, title 20, Appendix B (g)(7)(B)(xiii) requires a discussion of impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations. There was no discussion of impacts to environmental justice populations by technical sections other than socioeconomics.

DR SOCIO-4. Provide a discussion of the impacts to environmental justice populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations.

TRAFFIC AND TRANSPORTATION

California Code of Regulations, title 20, Appendix B (g)(5)(D)(vi) requires the application include estimated percentage of current traffic flows for passenger vehicles and trucks.

DR TRANS-1. Provide an assessment of the ability of Patterson Pass Road to safely accommodate project and construction traffic. The facility lacks shoulders and does not currently meet the County's design standards. Provide an evaluation of potential safety issues at the Patterson Pass Road/Mountain House Parkway/I-580 interchange in accordance with the requirements of the *Caltrans Local Development Review Safety Review Practitioners Guid*e (Caltrans Division of Safety Programs, February 2024). That document indicates that "*If the Project adds two or more car*

lengths to the ramp queue that would extend into the freeway mainline, then the location must be reviewed for traffic safety impacts. This review must evaluate speed differential between the off-ramp queue and mainline of the freeway during the same period." As level of service (LOS) E and F are identified at this interchange, the project may result in adverse queuing into the freeway mainline resulting in a safety impact.

California Code of Regulations, title 20, Appendix B (g)(5)(E)(i) requires the application include estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.

DR TRANS-2. Provide estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.

California Code of Regulations, title 20, Appendix B (g)(5)(E)(ii) requires the application include a description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities.

DR TRANS-3. Provide a drawing, description, and assessment of the safety and adequacy of the project's driveway on Patterson Pass Road. The intersection as depicted on Figure 2, Appendix 3.12, shows a narrow steep driveway intersecting Patterson Pass Road with limited acceleration or deceleration space for heavy vehicles entering and exiting the facility.

California Code of Regulations, title 20, Appendix B (i)(2) requires the name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.

DR TRANS-4. Indicate whether any relevant government officials were contacted to-date and provide contact information for all agencies listed in Section 3.12-6, along with the name and contact information for each agency official the applicant has contacted.

TRANSMISSION SYSTEM SAFETY AND NUISANCE

California Code of Regulations, title 20, Appendix B (g)(18)(B) requires applicant to submit an estimate of the existing electric and magnetic fields from existing switchyards and overhead and underground transmission lines that would be affected by the proposed project and the future electric (EF) and magnetic fields (EMF) that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also required is an estimate of the radio and television interference that could result from the project. No EMF estimates or radio and television interference from the project were provided.

DR TSSN-1. Please discuss future EF and EMF that would be created by the

proposed project.

DR TSSN-2. Please provide calculated EMF, EF values at the project substation of the site and at the edge of the rights of way for gen-tie line.

DR TSSN-3. Please estimate the radio and television interference that could result from the project.

California Code of Regulations, title 20, Appendix B (g)(18)(C) requires applicant to submit specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.

DR TSSN-4. Please discuss California Public Utilities Commission (CPUC) General Order 95, 128 and 131-D design standards and National Electrical Safety Code (NESC) design requirements relevant to project design. Indicate the steps which have been taken to minimize the EMF and EF effects, such as: over-head transmission line clearances with ground, right of way requirement, duct bank design for underground circuits, de-rated ampacity of conductors, conductor selection and substation grounding grid, etc.

California Code of Regulations, title 20, Appendix B (i)(1)(A) requires applicant to submit tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

DR TSSN-5. Please provide a table that identifies Transmission System Safety and Nuisance laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project.

TRANSMISSION SYSTEM DESIGN

Pursuant to California Code of Regulations, title 20, Appendix B (h)(2)(B), complete descriptions of the project transmission and interconnection facilities are required to determine whether the project, as proposed, would comply with CPUC GO 95, 128 and 131-D construction standards. Therefore, please provide following information:

DR TSD-1. Please provide one-line diagrams for the project substation. Show all equipment ratings including the bay arrangement of the circuit breakers, disconnect switches, buses, transformers, and other equipment that would be required for the project interconnection at the project site.

DR TSD-2. Please provide one-line diagram for the existing PG&E Tesla substation.

Show all equipment ratings including bay arrangement of the breakers, disconnect switches, buses, and other equipment. Show the project interconnection to the existing PG&E Tesla substation.

California Code of Regulations, title 20, Appendix B (b) (2) (C) requires applicant to submit a detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.

DR TSD-3. According to the California Independent System Operator (California ISO) study report one line-diagram included in the Interconnection Study, Confidential Appendix 2D, the applicant-proposed generator tie line will end at the dead-end structure of the current Tesla substation fence line. If this is the case, please specify the length of the gen-tie line that the applicant will construct. Additionally, please indicate the number of poles needed to support the overhead 500kV generator tie-line.

DR TSD-4. Please discuss the CPUC GO 128 standards in reference to the project's underground construction facilities, such as grounding, duct banks, derated ampacity, underground conductor clearances, and soil resistivity analysis.

California Code of Regulations, title 20, Appendix B (i) (1) (A) requires applicant to submit tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

DR TSD-5. Please provide a table that identifies Transmission System Design laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project.

California Code of Regulations, title 20, Appendix B (i) (1) (B) requires applicant to submit tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.

DR TSD-6. Please confirm if the Western Area Power Administration (WAPA) and Modesto Irrigation District (MID) have reviewed the California ISO cluster study 13, Phase I and II study reports, and have engaged in discussions with the applicant regarding downstream impacts and their mitigation measures. Furthermore, please confirm if there has been an agreement with the above utilities to carry out necessary reliability upgrades prior to the project's online date.

VISUAL RESOURCES

California Code of Regulations, title 20, Appendix B (g)(1) and (6) requires for visual resources a discussion of direct, indirect, and cumulative impacts due to the construction, operation, and maintenance of the project, as well as the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.

A potential impact to the visual integrity of the project site's hillside (and graded slope) areas is implied in several locations of Section 3-13 Visual Resources (TN 258025) by the presentation of measures to mitigate or avoid the potential impact. However, the actual impact is never fully stated or discussed in the visual impact subsections (Subsections 3.13.3.3, 3.13.3.5, and 3.13.4), and no applicable mitigation measure is identified in Subsection 3.13.5.

Specifically, Subsection 3.13.3.2 of the application states that "[graded] slopes along the Project's access roads and BESS facility would be reseeded, and the site would be routinely maintained and kept free of weeds, vegetation, and trash." Subsections 3.13.3.3 (KOP 1 and KOP 2); Subsection 3.13.3.5; and Subsection 3.13.6 (Table 3.13-3) of the application state that "graded slopes would be reseeded to mimic existing grassland conditions." Table 3.13-3 of the application also states that a Temporary Impacts Revegetation and Restoration Plan, which is included as Appendix 1L (TN 258256), has been prepared to "help ensure that grading required for the Project would not substantially damage the existing topography, thereby helping to preserve the visual integrity of the Project site's hillside areas."

DR VIS-1. For the appropriate subsections, specifically Subsections 3.13.3.2, 3.13.3.3, 3.13.3.5, 3.13.4, 3.13.5, and 3.13.6, provide a discussion of the potential impact to the visual integrity of the project site's hillside areas and project slopes. Specifically, address (at a minimum) the following issues:

- The potential impact to the visual integrity of the project site's hillsides and graded slopes.
- The necessary reseeding of graded and disturbed hillside areas and slopes to mimic existing grassland conditions.
- Slope and hillside maintenance to remove weeds, inappropriate vegetation, and trash.

- Other revegetation and restoration steps necessary to ensure that grading required for the project would not substantially damage the existing topography, thereby helping to preserve the visual integrity of the project's hillside areas and slopes.
- Incorporate information from the Temporary Impacts Revegetation and Restoration Plan (Appendix 1L) referenced in Table 3.13-3 as appropriate (briefly summarize and reference).

Also, please add an additional mitigation measure to be reviewed as part of Subsection 3.13.5 in the application that addresses the impact. As required by California Code of Regulations, title 20, Appendix B (g)(1), address the effectiveness of the proposed measure(s) and any monitoring plans proposed to verify the effectiveness of the mitigation. Please address, any temporary visual impacts that might result from implementation of the Temporary Impacts Revegetation and Restoration Plan (Appendix 1L), as appropriate.

California Code of Regulations, title 20, Appendix B (g)(1) requires the development of a cumulative setting for the project. Table 3-2 in Subsection 3.2 of the application provides a listing of the reasonably foreseeable projects. However, beyond the identification of PG&E's Tesla Substation, there is no specific identification of the various existing projects in the immediate project area that may combine with the project to create cumulative visual impacts. Of particular importance are the overhead utility lines that pass adjacent to the project site.

DR VIS-2. Please provide a figure and/or table that identifies the existing overhead utility lines that pass adjacent to the project site and includes the name and kV ratings.

California Code of Regulations, title 20, Appendix B (g)(6)(A) requires a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity. It also requires these descriptions along the proposed routes for any aboveground, project-related, linear facilities. This discussion is to include any distinguishing natural features, objects, or geologic characteristics that are recognized for their aesthetic value. Section 3.13.1.2 of the application is lacking this information.

DR VIS-3. Please expand the discussion of Section 3.13.1.2 Project Site to address any distinguishing natural features, objects, geologic characteristics (e.g., laccolith), or other terrain feature (e.g., open space or a tree) that are recognized for their aesthetic value. If no such features exist on the site, so state.

California Code of Regulations, title 20, Appendix B (g)(6)(C)(iv) requires that for each Key Observation Point (KOP), a spatially accurate and photo-realistic project simulation that represents the scene one year after completion of construction be submitted. This is to include all elements of the project including any proposed landscaping. Although formal landscaping is not proposed for the project, reseeding of slopes is proposed.

While the project simulations presented in Figures 3.13-4A and 4B (for KOPs 1 and 2, respectively) in Section 3.13 of the application illustrate the reseeding of project slopes, there is no indication as to the level of maturity of the seeded grass depicted in the simulations. Therefore, there is no way to assess completeness with respect to the "one year after completion of construction" requirement.

DR VIS-4. Please provide a discussion of Figures 3.13-4A and 4B and specify the level of maturity of the seeded grasses depicted in the simulations. If the simulated growth is other than one year, revise the simulations to reflect one year of growth.

California Code of Regulations, title 20, Appendix B (g)(6)(C)(v) requires that each KOP photograph and photo-realistic simulation are to be capable of 11" x 17" color-print by a printer capable at a minimum 600 dots per inch output resolution. The images provided, however, are of low resolution.

DR VIS-5. Please provide to the CEC project manager electronic files of stand-alone, high-resolution, KOP existing view and simulation images that are capable of being printed at 11" x 17" with a minimum 600 dots per inch output resolution.

California Code of Regulations, title 20, Appendix B (g)(6)(D)(i) requires scaled elevation(s) drawings of project buildings, structures, and major equipment be provided in the Visual Resources section.

DR VIS-6. Please provide scaled elevation drawings that identify the heights of buildings, structures, and major equipment including transmission structures. Structures and heights should correspond to what has been presented in the visual simulations and Table 3.13-2in Section 3.13 of the application.

California Code of Regulations, title 20, Appendix B (g)(6)(D)(iv)b., requires the calculated total pervious surface amount for the project site, including the surface to be replaced, the new surface, and the total area to be landscaped (or reseeded).

DR VIS-7. Please provide a calculation of the total pervious surface amount for the project site. Include the surface to be replaced, the new surface, and the total area to be landscaped (or reseeded).

California Code of Regulations, title 20, Appendix B (g)(6)(D)(v) requires that a project-specific, conceptual, outdoor lighting control and management plan (lighting plan) be provided that explains the control of reflectance from exterior surfaces off site that conforms with the city municipal code or county government code. A lighting plan has not been provided.

DR VIS-8. Please provide a project-specific, conceptual, outdoor lighting control and management plan, and explain the control of reflectance from exterior surfaces off site that conforms with the city municipal code or county government code. Tie the provision of the outdoor lighting control and management plan to a new

mitigation measure and submit for review, the purpose of which is to address the potentially significant visual impact that could occur with uncontrolled night lighting. Staff recommends submitting a revised Section 3.13 of the application due to the amount information that is being requested.

California Code of Regulations, title 20, Appendix B (g)(6)(D)(v)a., requires that a list of the project-specific luminaires be provided including the luminaire design (e.g., full-cutoff, semi-cutoff, non-cutoff) and whether or not the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Also required are the project-specific luminaires' locations on a diagram or elevation. A project-specific, conceptual, outdoor lighting control and management plan with this information has not been provided.

DR VIS-9. Please provide a list of the project-specific luminaires; identify the design (e.g., full-cutoff, semi-cutoff, non-cutoff); and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires' locations on a diagram or elevation.

California Code of Regulations, title 20, Appendix B (g)(6)(D)(v)b., requires that a description of project surface reflectance be provided including the intensity of the specular reflectance from the exterior surface of a project's large buildings, structures, and major equipment off site to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object–how bright it shines–depends on the intensity of the light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel).

DR VIS-10. As specified in the California Code of Regulations, title 20, Appendix B (g)(6)(D)(v)b., please describe project reflectance, and include the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment off site to the surrounding area (e.g., the light reflected from the shiny surface).

California Code of Regulations, title 20, Appendix B (i)(1)(A) requires that a table be submitted that identifies laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with, each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed. However, page references have not been provided, and conformance has not been broken down between construction and operation.

DR VIS-11. Please provide a table that identifies laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project and discussion of conformance for both

construction and operation. Provide reference pages wherein conformance, with each law or standard during both construction and operation is discussed.

California Code of Regulations, title 20, Appendix B (i)(1)(B) requires the identification of each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards and adopted local, regional, state, and federal land use plans, and to identify agencies that would have permit approval or enforcement authority, but for the exclusive authority of the commission, to certify sites and related facilities.

DR VIS-12. Please identify each agency with jurisdiction to issue applicable permits and/or approvals, but for the exclusive authority of the CEC, pertaining to the required project-specific, conceptual, outdoor lighting control and management plan.

California Code of Regulations, title 20, Appendix B (i)(2) requires contact information of an official who was contacted within each agency.

DR VIS-13. Subsection 3.13.7 of the application suggests that there were no agencies contacted regarding the required project-specific, conceptual, outdoor lighting control and management plan. Please provide the name, title, phone number, address (required), and email address (if known) of each official who will be contacted within each agency and provide the name of the official who will serve as a contact person for CEC staff.

California Code of Regulations, title 20, Appendix B (i)(3) requires the submittal of a schedule indicating when permits or approvals outside the authority of the CEC will be obtained and the steps the applicant has taken or plans to take to obtain such permits or approvals.

DR VIS-14. Provide a schedule indicating when approval(s) of the project-specific, conceptual, outdoor lighting control and management plan will be obtained and the steps that will be taken to obtain the approval(s).

WASTE MANAGEMENT

Appendix 1I Waste Management does not address how waste generated during operations will be managed, including storage areas and accumulation times. **DR HAZ-2** requires soil testing. The results of the soil testing from **DR-HAZ-2** and appropriate planning for soil management actions need to be included in revisions to Appendix 1I and summarized in Section 3.14.

DR WASTE-1. Please revise Appendix 1I with results of the soil testing and construction management actions based on the soil test results in **DR HAZ-2**.

DR WASTE-2. Please add information on management of hazardous waste generated during operations to Appendix 1I, including storage areas and

accumulation times. Appendix 1I (p.10) includes federal regulations and not recent amended California regulations. Please include most current California regulations, which were amended in 2024 with the generator amendments.

WATER RESOURCES

Section 3.15, Water Resources, Subsection 3.15.3.3 of the application indicates no permanent water supply or sanitary facilities would be constructed at the site, but that an operations and maintenance building would be constructed for the project's anticipated three full-time operations staff, potable water would be trucked to a water storage tank for washroom and sanitary facilities, and sewage/wastewater would be collected in a separate tank and transported offsite for disposal.

DR WATER-1. Provide a discussion of how the proposed temporary facilities for water supply and wastewater disposal, to be used as permanent long-term facilities, comply with Alameda County codes and ordinances related to Land Use and Environmental Health.

DR WATER-2. Provide information related to state and local laws and regulations for water hauling of water to serve the project. Include contractual agreements or approvals between the water supplier or purveyor, water hauler, and the ultimate site user. Provide well permits and approvals demonstrating that water can be supplied and hauled in compliance with state regulations.

DR WATER-3. Provide the status of all appropriate agencies' approvals for the proposed water supply, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agencies' regulation(s).

DR WATER-4. Identify and provide a copy of the will-serve letter, permit or contract with the public or private entity that will be accepting the wastewater generated by the project. Discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical characteristics of the project's wastewater for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.

DR WATER-5. Provide descriptions of all significant assumptions, methodologies, and computational methods used, including those specifically related to calculations or other computations requested within this section.

Storm Water Discharge – Construction Activities

Section 3.15 Water Resources, Subsection 3.15.3.3 of the application states the project would be required to apply for coverage under a National Pollution Discharge

Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order WQ 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit). Federal regulations for stormwater discharges require projects that result in construction activity with a land disturbance of 1 acre or more to obtain NPDES permit. The Construction General Permit allows prospective dischargers to obtain permit coverage. The Construction General Permit was developed to allow for statewide permit coverage, that stormwater discharge is regulated, and water resources are protected. The Construction General Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP to include a description of proposed Best Management Practices (BMP) to control stormwater discharge from construction work sites. Standard permit registration documents (as listed in Attachment B of the Construction General Permit) include, Site Map, Risk Assessment (Standard or Site-Specific), SWPPP, Post-Construction Water Balance, and Active Treatment Systems (ATS) design as applicable. Other registration documents (e.g. NOI, fee, etc.) are required at the time of application to the RWQCB and prior to the commencement of construction activity. For staff to evaluate potential impacts and proposed mitigation measures to address those impacts, additional information is required.

DR WATER-6. Please provide the following standard permit registration documents:

a. Notice of Intent to request coverage under the Construction General Permit (CGP), including a Risk Level Determination, submitted through the State Water Board Stormwater Multiple Application and Report Tracking System (SMARTS) and provide confirmation of the date submitted to the CEC;

b. Site Drawings and maps of areas requiring CGP coverage;

c. Construction Stormwater Pollution Prevention Plan (SWPPP) developed by a Qualified SWPPP Developer (QSD) or modifications to the Erosion and Sediment Control Plan, Potentia-Viridi Battery Energy Storage Project, Alameda County, California, July 2024, to conform to the requirements of the Construction General Permit

Jurisdictional Waters Water Quality Certification

Section 3.15, Water Resources, Subsection 3.15.3.3 of the application states approximately 10 cubic yards of clean rip-rap would be placed as an energy dissipator at the outfall to discharge clean stormwater at or below current rates at the elevation of the ordinary high-water mark of the existing drainage on the south side of Patterson Pass Road. The Nationwide Permit Pre-Construction Notification Supplemental Information document also describes activities requiring such permit including improvements to an existing stormwater culvert and outfall that discharges to a jurisdictional water of the United States, and the construction of a permanent water crossing of the same feature. As noted in the application, both a Clean Water Act (CWA) Section 404 Permit and CWA Section 401 Water Quality Certification must be

obtained prior to site disturbance. Pursuant to Sections 13376 and 13260 of the California Water Code, any person discharging dredge or fill materials to waters of the State must file a report of waste discharge. California Code of Regulations, title 20, Appendix B, 14 (A) (i) requires an applicant provide all the information required to apply for CWA Section 401 Water Quality Certification and other relevant permits.

DR WATER-7. Provide a complete Section 401 Water Quality Certification application for certification. The following link includes the application materials and guidance documents regarding information needed for a complete application. (https://www.waterboards.ca.gov/water_issues/programs/cwa401/#resources). Please include the following:

a. An aquatic resource delineation report verified by U.S. Army Corps of Engineers, if verification is required by the Corps;

b. A description of the waters proposed to be impacted by the project including the quantity of impacts to waters proposed to receive a discharge of dredged or fill material at each location rounded to at least the nearest one-hundredth (0.01) of an acre and nearest linear foot, and cubic yards of fill.

c. A compensatory mitigation plan for permanent physical loss and permanent ecological degradation of a water of the state. The plan shall comport with State Water Resources Control Board's Supplemental Dredge or Fill Guidelines, Subpart J. A link is provided: State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State - Revised April 6, 2021 (available at https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf)

DR WATER-8. Include copies of any correspondence along with meeting notes with regulatory agencies regarding permitting issues or other relevant topics and include the name of officials contacted within each agency.

WILDFIRE

The applicant proposed a mitigation measure, MM-WF-3, which is discussed in the Section 3.17.3.3 but is omitted from the list of mitigation measures in Section 3.17.5, on page 3.17-17.

DR FIRE-1. Please add the measures proposed to be implemented as part of MM-FIRE-3 to the mitigation measures in Section 3.17.5.

There is no mention of SB 38 requirements in the discussion of evacuation plans. California Senate Bill 38 (Laird, Chapter 377, Statutes of 2023) requires the owner or operator of each battery energy storage facility to submit an emergency response and emergency action plan to the county. There is no mention of SB 38 requirements in the discussion of evacuation plans.

DR FIRE-2. Please add a discussion of the California requirements in SB 38 for preparing and submitting an emergency response and emergency action plan to the county.

WORKER SAFETY

The location of this proposed project in Alameda County has experienced multiple days of high heat (95º F and above as defined by Cal. Code Regs., tit. 8, § 3395) in the past decade due to global climate change and more days are predicted in the future. This important worker safeguard should be discussed and described in full. Other California Code of Regulations, title 8, requirements for construction and operation should also be discussed and described.

DR WS-1. Please include a discussion of the implementation of California Code of Regulations, Title 8, section 3395 Heat Illness Prevention in Outside Places of Employment. Furthermore, add all other applicable California Code of Regulations, Title 8, requirements for construction and operation.

Detailed descriptions of the fire suppression systems were not included in Section 3.16 or Section 3.17 and are necessary for staff to evaluate the impacts of the project.

DR WS-2. Please provide more details related to the BESS fire prevention, detection, and suppression systems considered for installation. Provide details on how the interior of a BESS enclosure would be cooled after a fire event. Provide information on the leak detection equipment for the BESS and detection and venting equipment for hydrogen gas. Provide more information related to fire suppression systems for the overall facility including the location of hydrants and when traditional water fire suppression would be used vs other methods (e.g. aerosol system).

Subsection 3.16.1.4 (p. 3.16-17) of the application notes that the BESS would consist of National Fire Protection Association (NFPA) 855 (Standard for the Installation of Energy Storage Systems) compliant and UL certified systems.

DR-WS-3. As required by NFPA 855, please add a discussion of the BESS hazard mitigation analysis to be prepared in compliance with UL 9540A. The hazard mitigation analysis shall include consideration of potential thermal runaway fault conditions occurring within a single battery storage rack, cell module or cell array (i.e., cell level, module level, unit level and installation level). The analysis shall include mitigation measures to prevent flammable gases released during fire, battery overcharging, and other abnormal operating conditions within the BESS from creating an explosion hazard that could injure workers or emergency first responders.

Staff reviewed Table 3.16-6 and found that contact names and titles were omitted.

DR WS-4. Please provide the missing names and titles of contacts found in Table 3.16-6.

A description of all applicable permits is necessary for staff to evaluate the impacts of the project.

DR WS-5. Please list applicable CalOSHA permits and corresponding schedule information.