

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	262144
Document Title:	County of Solano Revised Request for Reimbursement Pursuant to Public Resources Code Section 25538 – NOTICE OF DEFICIENCY
Description:	County of Solano Revised Request for Reimbursement Pursuant to Public Resources Code Section 25538 – NOTICE OF DEFICIENCY
Filer:	Renee Longman
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	3/11/2025 8:36:45 AM
Docketed Date:	3/11/2025



March 11, 2025

James Bezek, Director
Solano County Department of Resource Management
675 Texas Street, Suite 5500
Fairfield, California 94533

**Re: County of Solano Revised Request for Reimbursement Pursuant to
Public Resources Code Section 25538 – NOTICE OF DEFICIENCY**

Dear James Bezek:

The California Energy Commission (CEC) received Solano County's revised request for reimbursement letter and estimate of expenses for review of the Corby Battery Energy Storage Project (24-OPT-05) Opt-In Certification Application filed on February 25, 2025 (TN 261972). CEC staff reviewed the revised request for reimbursement and proposed budget and determined the proposed budget is incomplete.

Pursuant to California Code of Regulations, title 20, section 1878.1(c)(3), the following details the deficiencies that must be corrected to complete the proposed budget request process under California Code of Regulations, title 20, section 1878.1:

A. Justification of Line-Items

California Code of Regulations, title 20, section 1878.1(c) requires the proposed budget to justify each line-item amount and explain how each line-item is reasonably related to the matters which the agency is requested to review. Attachment A, Revised Reimbursable Costs Spreadsheet Summary, identifies line-item costs for multiple categories.

Attachment A County Revised Budget Summary

BUDGET FOR APPLICATION ANALYSIS	\$	3,194
BUDGET FOR COMMENT LETTER REIMBURSEMENT	\$	7,859
LOSS OF REVENUE FROM PERMITS/DEVELOPMENT IMPACT FEES NOT RECEIVED	\$	1,087,631
PUBLIC WORKS - GRADING PERMIT FEE	\$	17,917
PUBLIC WORKS - ENCROACHMENT PERMIT FEE	\$	20,795
PUBLIC WORKS - ROAD DAMAGE MITIGATION/BYRNES RD	\$	343,200
PUBLIC WORKS - ROAD DAMAGE MITIGATION/KILKENNY RD	\$	64,178
PUBLIC WORKS - ROAD DAMAGE MITIGATION/WEBER RD	\$	95,924
BUILDING - PLAN REVIEW FEE	\$	206,348
BUILDING - BUILDING PERMIT FEE	\$	317,459
BUILDING - BUILDING INSPECTION FEE	\$	17,800
BUILDING - STATE ADMINISTRATION FEE	\$	4,000
BUILDING - ARCHIVE FEE	\$	10
NET POSITIVE ECONOMIC BENEFIT ANALYSIS	\$	22,769.73
COMMUNITY BENEFITS PLAN & AGREEMENT	\$	2,210.7
DESIGN, CONSTRUCTION & OPERATION/PUBLIC NECESSITY/LORS OVERRIDE	\$	14,590.3
QUALIFYING CEQA REVIEW & COMMENT	\$	47,750.1
COSTS INCURRED TO DATE:	\$	11,053.3
PERMITS/DEVELOPMENT/IMPACT FEES:	\$	1,087,630.9
FORECASTED COSTS FOR CONTINUED REVIEW:	\$	87,320.8
GRAND TOTAL:	\$	1,098,684.2

However, the county's proposed budget does not include justification for each line-item budget amount and does not explain how it is reasonably related to the matters which the agency is requested to review. In addition, please provide sufficient detail for each line-item category. As an example, please identify the expenses included in the "Net Positive Economic Benefit Analysis," "Community Benefits Plan & Agreement," "Design, Construction & Operation/Public Necessity/LORS Override," and "Qualifying CEQA Review & Comment" by line-items in addition to the total amount for these categories. Please update your request to include this information.

Note that the CEC staff does not expect the county to develop exhaustive analysis on the application or to procure expertise to review an application. Local jurisdictions generally focus their comments on topical areas of local concern and identify local laws that the jurisdiction wants to highlight for staff such as noise ordinances, local methods of calculating vehicle miles traveled, or local architectural standards. For samples of prior comment letters from local jurisdictions, see:

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=243152&DocumentContentId=76834>

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=245911&DocumentContentId=80088>

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=68804&DocumentContentId=46742>

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=211504&DocumentContentId=6960>

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=251881&DocumentContentId=86879>

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=251870&DocumentContentId=86863>

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=251675&DocumentContentId=86576>

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=56264&DocumentContentId=52408>

Staff recommends a meeting be scheduled between CEC staff and the County to discuss this matter in advance of any subsequent proposed budget being submitted. A meeting will also provide CEC staff an opportunity to help the County refine the categories identified in the budget and cover permitting fees. To schedule a meeting, please email CEC staff's project manager, Renee Longman, at Renee.Longman@energy.ca.gov.

Sincerely,

Dian Vorters

Dian M. Vorters
Deputy Director, Siting, Transmission &
Environmental Protection