| DOCKETED | |
|---|---|
| **Docket Number:** | 03-AFC-02C |
| **Project Title:** | Los Esteros Phase II Compliance |
| **TN #:** | 268869 |
| **Document Title:** | Data Response Set 2B Tanager Battery Energy Storage System Project |
| **Description:** | Data Response Set 2B Tanager Battery Energy Storage System Project |
| **Filer:** | Jeffery D. Harris |
| **Organization:** | Climate Edge Law Group |
| **Submitter Role:** | Applicant Representative |
| **Submission Date:** | 2/27/2026 2:51:26 PM |
| **Docketed Date:** | 2/27/2026 |

# Petition for Modification
# Tanager Battery Energy Storage System Project

# Data Response Set 2B

## Los Esteros Critical Energy Facility
## 03-AFC-02C

Submitted to
**California Energy Commission**

Submitted by
**Los Esteros Critical Energy Facility, LLC**

February 2026

**LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)**
**Petition for Modification- Tanager BESS Project**
**DATA RESPONSE SET 2B**

Los Esteros Critical Energy Facility, LLC, on behalf of Tanager Power, LLC ("Tanager Power"), provides the following responses to the California Energy Commission ("CEC") Staff's Data Request Set 2. These responses address Revised Data Response 42 and Data Requests A50 through A52, and supplement *Data Response Set 2A*[1], for the Tanager Battery Energy Storage System ("BESS") Project ("Project").

The responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as presented in CEC Staff's Data Request Set 2[2] and are keyed to the Data Request numbers.

## TRANSMISSION SYSTEM ENGINEERING DATA REQUESTS

*A42. Please provide the California Independent System Operator (California ISO) Queue Cluster 12 Phase II Interconnection Study Report. Please include the Area report, all the appendices, and attachments.*

**Revised Response A42:** The California Independent System Operator ("CAISO") has authorized provision of the Queue Cluster 12 Phase II Interconnection Study Report ("Phase II") to the CEC. Because the Phase II contains confidential critical energy/electricity infrastructure information, it was submitted under an Application for Confidential Designation as Confidential Attachment DR-A42 on February 13, 2026.[3]

## BATTERY ENERGY STORAGE SYSTEM REFRIGERANT PROHIBITION DATA REQUESTS

*A50. Please provide manufacturer specifications for the BESS cooling system that detail the temperature at which the chilled fluid would exit the BESS cooling system.*

**Response:** The primary components of the liquid cooling unit consist of a heater, compressor, condenser, water pump and condenser fan. The manufacturer specifications for the Hithium BESS cooling system available on the market today are provided in the table below.

| ***Parameter*** | ***Specifications*** |
|---|---|
| *Operating temperature* | *-30°C ~55°C (-22°F~131°F)* |
| *Operating altitude* | *<4000m (<13123 ft)* |
| *Coolant* | *Glycol-water coolant solution* |
| *Type of refrigerant* | *R410A* |
| *Supply voltage* | *480VAC±10%, 60±3Hz* |

[1] TN: 268416.
[2] TN: 267573.
[3] TN: 268635.

| ***Parameter*** | ***Specifications*** |
|---|---|
| *Cooling capacity* | *Rated value >60kW@45°C (113°F) ambient temperature* |
| *Heating capacity* | *Rated value >12kW@10°C (50°F) ambient temperature* |
| *Weight* | *<485kg (<1069.2 lbs)* |
| *Dimension (W*D*H)* | *1600mm*510mm*2580mm (63.0 in * 20.1 in * 101.6 in)* |

*A51. Please demonstrate how the proposed refrigerant would comply with the HFC prohibitions stated in 17 CCR Section 95371, et seq.*

**Response:** Although Tanager Power is aware that the California Air Resources Board's ("CARB's") Hydrofluorocarbon ("HFC") Reduction Team considers use of HFCs to cool utility scale battery storage equipment to be use in a "chiller" for "Industrial Process Refrigeration", Tanager Power respectfully believes this interpretation is not supported by the text of the regulatory definition. A battery has no "process stream" and does not involve manufacturing or any industrial process. The thermal regulation system in a battery container furthermore is not an air conditioner. Neither CARB nor any stakeholder suggested during CARB's 2020-21 rulemaking that battery storage facilities might be considered an "industrial process." In addition, the U.S. Environmental Protection Agency ("EPA") interprets its HFC regulations, which similarly apply to "chillers" associated with "industrial process refrigeration", to exclude battery energy storage systems from coverage.

As described in the response to Data Response A7 (TN 266305), the liquid cooling unit is currently designed to be equipped with the refrigerant R410A or similar refrigerant. Use of R410A in certain processes is restricted by 17 CCR Section 95371, *et seq.* As explained above, however, whether use for thermal regulation of battery storage equipment is a covered process is being questioned by industry stakeholders, who are further investigating alternative solutions. Whatever the outcome of these proceedings, the BESS containers delivered to and installed at the Project site will comply with all regulations applicable to HFC use in utility scale battery products.

*A52. If the proposed refrigerant does not comply with the HFC prohibitions stated in 17 CCR Section 95371, et seq., please propose an alternative refrigerant and provide an annual GHG emissions calculation due to refrigerant leakage (in metric tons of carbon dioxide equivalent).*

**Response:** Tanager Power is evaluating, with Hithium, the application of HFC prohibitions to the Project. If alternatives to R410A with a 750 GWP limit are needed to comply with 17 CCR Section 95371, ***et seq.***, Tanager Power will work with the manufacturer to identify a suitable alternative and will supplement the greenhouse gas ("GHG") emissions information previously provided for the Project, if necessary. Given that the objective of HFC limitations is to reduce GHG emissions, however, any substitutions should only decrease prior estimates.