

DOCKETED

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**Petition for Post-Certification Modification
Tanager Battery Energy Storage System Project**

Data Response Set 3A

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

Submitted to
California Energy Commission

Submitted by
Los Esteros Critical Energy Facility, LLC

May 2026

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
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Los Esteros Critical Energy Facility, LLC, on behalf of Tanager Power, LLC, provides the following responses to the California Energy Commission (“CEC”) Staff’s Data Request Set 3. These responses address Data Requests A68 through A69, A71 through 72, A74, A77, and A80 through A81 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 3¹ and are keyed to the Data Request numbers.

BATTERY ENERGY STORAGE SYSTEM (BESS) THERMAL RUNAWAY/FIRE IMPACTS

DATA REQUESTS

A64. *In addition to the toxic air contaminants (TACs) modeled in Table 4 (TN 268268), please also provide a dispersion modeling analysis of the TACs mentioned above using available representative data from the literature review or measured from any BESS test.*

RESPONSE: A response to Data Request A64 is in process and will be provided as part of a supplemental data response set.

A65. *If the modeling data originates from literature review, provide a copy of the referenced literature. If the modeling data come from a BESS test, then provide the specific analytical method(s) for determining the presence of off-gassing constituents in the test, including sample collection methods, laboratory preparation methods, analytical methods, the MDL (method detection limit) or PQL (practical quantitation limit) or RL (reporting limit) for all measured constituents, and all QA/QC (quality assurance/quality control) data including results of a spiked sample.*

RESPONSE: A response to Data Request A65 is in process and will be provided as part of a supplemental data response set.

A66. *Please compare all the modeled TACs concentrations (the ones modeled in TN 268268 and the ones requested above) to appropriate health-based exposure thresholds, including the U.S. EPA Acute Exposure Guideline Levels (AEGLs), the OEHHA/CARB acute Reference Exposure Levels (RELs), and Emergency Response Planning Guidelines (ERPGs) thresholds but excluding the Immediately Dangerous to Life or Health (IDLH) levels since they are not health protective.*

RESPONSE: A response to Data Request A66 is in process and will be provided as part of a supplemental data response set.

A67. *Please demonstrate whether the acute hazard Index (HI) of TACs would be higher than the significance threshold of 1.0 at sensitive receptors. If the acute HI would exceed 1.0 or the criteria air pollutant impacts would cause or contribute to any*

¹ TN: 269329, docketed March 26, 2026.

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exceedance of ambient air quality standards, please explain what mitigation measures are planned to be implemented to reduce the impacts to less than significant.

RESPONSE: A response to Data Request A67 is in process and will be provided as part of a supplemental data response set.

A68. *Please provide the dispersion modeling files of AERMOD and HARP.*

RESPONSE: Modeling files for previously submitted dispersion models were provided to CEC Staff via Kiteworks as part of Data Response Set 2B. Additional dispersion modeling files, if any, will be submitted as part of a supplemental data response set.

A69. *Please provide the UTM coordinates of the five (5) hypothetical locations of thermal runaway events at the Tanager BESS site.*

RESPONSE: The UTM coordinates (USGS UTM NAD83, Zone 10) for the hypothetical locations are listed below. The UTM coordinates were also provided in the modeling files submitted to CEC Staff via Kiteworks on as part of Data Response Set 2B.

Source ID	Type	X Coord	Y Coord.	X Coord	Y Coord.
TANAGER1	BUOYLINE	594449.822	4142269.862	594456.167	4142271.684
TANAGER2	BUOYLINE	594545.530	4142298.142	594551.874	4142299.965
TANAGER3	BUOYLINE	594656.289	4142330.877	594663.039	4142332.699
TANAGER4	BUOYLINE	594626.659	4142432.862	594633.274	4142434.752
TANAGER5	BUOYLINE	594530.816	4142404.582	594537.295	4142406.404

A70. *Other than the highest 1-hour modeling concentrations of TACs in Table 4 (TN 268268), please also report the 1-hour modeling concentrations of TACs of the two sensitive receptors: (1) the one approximately 500 meters towards the south-southeast, (2) the one approximately 822 meters towards the west-southwest with multiple sensitive receptors.*

RESPONSE: A response to Data Request A70 is in process and will be provided as part of a supplemental data response set.

A71. *Some AEGL-1 values in Table 3 and Table 4 (TN 268268) are wrong. Please correct the AEGL-1 values for Butane and Propane.*

RESPONSE: Updated tables are provided in Attachment DR-A71.

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WORKER SAFETY AND FIRE PROTECTION

BATTERY ENERGY STORAGE SYSTEM (BESS) TECHNOLOGY

DATA REQUESTS

A72. *Provide the Hazard Mitigation Analysis in accordance with the 2025 edition of the California Fire Code for the proposed BESS.*

RESPONSE: Consistent with conversations and consultation with the San Jose Fire Department, a Hazard Mitigation Analysis will be prepared following approval of the petition and the detailed design process to ensure that department resources and review time are efficiently utilized. A description of how the Hazard Mitigation Analysis will be prepared in conformance with applicable laws, ordinances, regulations, and standards, including relevant National Fire Protection Association (“NFPA”) provisions, was provided in Data Response A28.

A73. *Provide a history of failure incidents involving at least one enclosure or multiple enclosures of the proposed BESS at a single facility, and a complete description of the proposed measures to prevent failure incidents for the proposed project (provided under confidential cover if trade secrets and commercially sensitive information are included).*

RESPONSE: A response to Data Request A73 is in process and will be provided as part of a supplemental data response set.

DATA REQUESTS

A74. *Provide the contact information (name, title, email address, phone number) for the contact(s) at the San Jose Fire Department with knowledge of the proposed project.*

RESPONSE: The key points of contact for the San Jose Fire Department are Paul Thomas and Jagdev Mavi.

Primary: Paul Thomas
Senior Hazardous Materials Inspector

[REDACTED]
200 E. Santa Clara Street, 2nd Floor, San José, CA 95113

Secondary: Jagdev Mavi
Division Manager

[REDACTED]
200 E. Santa Clara Street, Tower 2nd Floor, San José, CA 95113

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WATER-BASED FIRE PROTECTION SYSTEMS FOR BESS PROJECT

DATA REQUESTS

A75. *Please provide a fire water supply analysis to confirm adequate water supply. Provide a discussion of the project's worst-case fire flow requirements in GPM (gallons per minute) for each of the project's exposure hazards (e.g. transformer fire, BESS fire). Provide descriptions of all significant assumptions, methodologies, and computational methods used in arriving at those conclusions.*

RESPONSE: A response to Data Request A75 is in process and will be provided as part of a supplemental data response set.

A76. *Please provide a schematic, equivalent to at least 30 percent design plans, and a complete description of the proposed fire protection systems for the proposed project, such as the fire water loop, fire water storage tanks, fire pumps, fire hydrants, etc.*

RESPONSE: A response to Data Request A76 is in process and will be provided as part of a supplemental data response set.

A77. *Please provide a schematic, equivalent to at least 30 percent design plans, and a complete description of the proposed fire detection and alarm systems for the proposed project. Include a discussion of the monitoring capability and technology for the proposed project, such as off-site remote monitoring and/or monitoring by personnel at the existing LECEF control room.*

RESPONSE: A schematic equivalent to a 30 percent design for the project is underway but is not expected to be complete until closer to the time when the project would be constructed (as is often and appropriately the case, given that applicants cannot make significant investments in specific designs that might need to be changed in response to permitting conditions or might not ultimately be approved for construction). In lieu of detailed, project specific designs, we are nevertheless providing, as an example, portions of the schematic developed for another Calpine BESS facility that used the same battery product expected for use at the facility proposed here (Hithium Infinity Block Generation 2 BESS, a pre-assembled, NWI style lithium-ion BESS container with an energy capacity of 5,015 kWh). This example is provided as Confidential Attachment DR-A77, and will be filed under an application for confidential designation given the sensitive nature of the information.

The Hithium BESS is equipped with a smoke and fire detection system consisting of heat detectors, smoke detectors, horn/strobes (fire alarm and amber gas alarm signals), control modules, monitor modules, and a manual pull station. These devices will be monitored by the site fire alarm control panel(s) ("FACP"). The FACP will be installed at the first responder station ("FRS") located at the main gate for the monitoring and control of the fire alarm devices for the BESS.

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The Lithium BESS container is provided with a battery management system (“BMS”) that can identify possible risks to the battery system by monitoring battery cell temperature, voltage, and current, and provide system shutdown and isolation capability. The BMS is monitored by the energy storage management system (“ESMS”), which provides remote monitoring and system shutdown capability. The BMS function is intended to mitigate the risk of thermal runaway by preventing the risks of over-charge, over-discharge, over-temperature, and over-current.

Alarm signals from the detection systems will be transmitted to a supervisory station at the existing LECEF control center, in accordance with California Fire Code (“CFC”) §1207.5.4 and NFPA 72.

EMERGENCY RESPONSE AND EMERGENCY ACTION PLAN

DATA REQUESTS

A78. *Please provide description of the emergency response training that will be offered to the local emergency management agencies during construction and operations of the proposed project. Provide a discussion of the content, frequency, and emergency scenarios to be covered in the training.*

RESPONSE: A response to Data Request A78 is in process and will be provided as part of a supplemental data response set.

A79. *Please provide a complete description of the proposed emergency response training provided to project personnel (workers and management) during construction and operations should a failure incident involving the BESS occurs.*

RESPONSE: A response to Data Request A79 is in process and will be provided as part of a supplemental data response set.

A80. *Please provide the most current emergency response recommendations from the proposed BESS manufacturer.*

RESPONSE: The manufacturer Emergency Response Guide is provided as Confidential Attachment DR-A80, and will be filed under an application for confidential designation given the sensitive nature of the information. The Emergency Response Guide includes emergency response recommendations and recommended notifications, which will be incorporated into the LECEF Emergency Response Plan as appropriate.

A81. *Please provide a discussion of the proposed project’s consistency with local standard requirements for response time and distance from fire stations, EMS capabilities, and hazardous materials teams.*

RESPONSE: The City of San José’s adopted standard for emergency response time is provided below.

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Table A81-1 City of San Jose Adopted Standard for Emergency Response Time

Type of Incident	Response Time	Percentage of Total Incidents
Priority 1- incidents requiring immediate response with emergency vehicles using lights and sirens	8 minutes	80%
Priority 2 – incidents requiring immediate response but no use of lights and sirens	13 minutes	80%

The City’s response time is measured from the time that the 9-1-1 call is received and the time when the emergency vehicle arrives at the incident address.

The responding fire station for fire and EMS incidents is San José Fire Department Station 25, which is located at 5125 Wilson Way in Alviso. Station 25 is located approximately three miles from the project site and first responder arrival on site would typically require approximately six minutes. For a HAZMAT response, Station 29 has a Type 1 certified HAZMAT team, providing the highest level of hazardous materials response capability. Station 29 is located approximately two miles from the project site and would be able to reach the site in less than seven minutes following receipt of a 9-1-1 call. Therefore, the emergency response times for the proposed project are expected to be within the City of San José’s standards for fire and EMS incident response times.

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ATTACHMENT DR-A71

Table 3 Health Impact Thresholds (1-hr average)							
Substance	CAS	AEGL 1 ug/m ³	AEGL 2 ug/m ³	AEGL 3 ug/m ³	ERPG 1 ug/m ³	ERPG 2 ug/m ³	ERPG 3 ug/m ³
Hexane (C6 total)	110543	10,222	10,000,000	-	-	-	-
CO	630080	-	-	-	229,040	400,820	572,600
Benzene	71432	170,000	2,600,000	-	159,735	480,000	3,194,699
Toluene	108883	250,000	2,100,000	-	565,279	1,100,000	3,768,526
Butane (C4 total)	106978	13,000,000	-	-	-	-	-
Propene	115071	-	-	-	-	-	-
Propane	74986	9,900,000	-	-	-	-	-
Notes: AEGL values – 1 Hr ppm values converted to ug/m ³ ERPG values – AIHA ERP Guideline Values, 2022 (ppm values converted to ug/m ³) except for ERPG-2 values are converted from mg/m ³ to ug/m ³ .							

Table 4 1-Hour Modeling Results				
Substance	CAS	Modeled Concentration ug/m ³	AEGL-1 ug/m ³	ERPG-2 ug/m ³
Hexane (C6 total)	110543	0.924	10,222	-
CO	630080	207.51	-	400,820
Benzene	71432	0.718	170,000	480,000
Toluene	108883	0.047	250,000	1,100,000
Butane (C4 total)	106978	60.25	13,000,000	-
Propene	115071	48.51	-	-
Propane	74986	31.07	9,900,000	-
Notes: AEGL values – 1 Hr ppm values converted to ug/m ³ ERPG values – AIHA ERP Guideline Values, 2022 (ppm values converted to ug/m ³) except for ERPG-2 values are converted from mg/m ³ to ug/m ³ .				

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CONFIDENTIAL ATTACHMENT DR-A77

(Submitted separately under an application for confidential designation.)

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CONFIDENTIAL ATTACHMENT DR-A80

(Submitted separately under an application for confidential designation.)