

DOCKETED

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Project Title:	Los Esteros Phase II Compliance
TN #:	271755
Document Title:	Petition for Post-Certification Modification for Los Esteros Tanger Battery Energy Storage System (BESS) Project
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California
ENERGY COMMISSION



CALIFORNIA
**NATURAL
RESOURCES
AGENCY**

July 29, 2026

Barbara McBride
Calpine Corporation
3003 Oak Road
Walnut Creek, CA 94597

RE: Petition for Post-Certification Modification for Los Esteros Critical Energy Facility (03-AFC-02C) Project - Data Request Set 5, A111 through A116

Dear Barbara McBride:

The California Energy Commission (CEC) staff is requesting information specified in the enclosed Data Requests Set 5, which is necessary for the staff analysis of the Los Esteros Critical Energy Facility (LECEF) for the proposed Tanager Battery Energy Storage System (BESS) project petition to amend ([TN# 261280](#)). The project owner seeks approval to modify the LECEF Decision to deploy a 200-megawatt (MW) lithium-ion phosphate (LFP) BESS, with deployment of 1,600 megawatt-hours, on approximately ten acres.

Data Requests – Set 5 seeks further information in the areas of Land Use and Transportation based on the contents of the petition to amend.

To assist CEC staff in timely completing its environmental review and to meet the requirements of the California Environmental Quality Act (CEQA) (see Cal. Code Regs., tit. 14, §§15108, 15109), CEC staff request responses to the data requests as soon as possible. If you are unable to provide the information requested or need to revise the timeline, please let me know within 10 days of receipt of this letter.

If you have any questions, please email me at John.Heiser@energy.ca.gov.

John Heiser
Compliance Project Manager

Enclosure: Data Requests, Set 5

**Petition for Modification
Los Esteros Critical Energy Facility (03-AFC-02C)
DATA REQUESTS – SET 5**

Technical Area: Land Use

Author: Jeanine Hinde

BACKGROUND

The application includes a statement on the location of temporary construction and laydown for the Tanager BESS. In the Cultural Resources Assessment under subsection 2.3, "Project Construction," it states that laydown would occur "within the proposed BESS site or on paved roads." There is no information on where construction parking would be established.

It is also stated there would be "no additions to the project area" for site access. However, under "Modifications to the Existing LECEF" on page 2 of the Petition for Modification, it states that the project would "require the addition of a third entrance to the parcel..." (In Data Request Set 4 for Land Use, CEC staff requested a revised plan view or new map with setbacks and other project features labeled, which is anticipated from the applicant.)

DATA REQUESTS

A111. Provide further information clarifying what part of the project site and adjacent areas would be used for temporary construction parking and laydown. Include information on what "paved roads" or other roads would be used for these purposes. Please add these areas to the revised plan view or new map requested for Land Use in Data Request Set 4.

A112. Please correct the conflicting statement that there would be no additional site access.

Technical Area: Transportation

Author: Andrea Koch

BACKGROUND

The CEQA Guidelines are not specific on whether to include or exclude construction traffic in the vehicle miles traveled (VMT) calculations, and the issue has not been specifically cited in any legal opinions. However, the California Air Resources Board released the Final Environmental Assessment on its Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target (Scoping Plan). In its programmatic analysis of impacts relating to transportation and traffic, it was concluded that construction activities would result in short-term construction traffic (primarily motorized) from worker commute and materials delivery trips. "Project specific impacts and mitigation would be identified during the environmental review by agencies with project-approval

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authority". This suggests that analyzing construction-related impacts on transportation is of interest to the state. Given that construction of the project would generate a greater number of trips than operation, CEC staff concludes it is appropriate to examine the VMT during construction.

Section 15064.3, subdivision (a) of the CEQA Guidelines states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Here, the term 'automobile' refers to on-road passenger vehicles, specifically cars and light trucks." Based upon the above considerations, the VMT analysis should evaluate worker, not truck, trips to/from the site during the construction phase.

Below is an example of a VMT analysis for this type of project (excerpted and adapted from the Potentia-Viridi Battery Energy Storage System Staff Assessment, 24-OPT-04, TN 268314):

Construction worker vehicle trip generation is summarized in Table 5.14-4. The project workforce is expected to commute from within a 26-mile radius of the project site. Daily worker trips and trip lengths were multiplied for each phase of the project to estimate total worker VMT for each construction phase. The sum of the total worker VMT for each construction phase provides an estimate of total worker VMT for the entire construction period. The total worker VMT over the construction period was then normalized over the 25-year project life, which was estimated as 9,100 days, to calculate a total daily worker VMT which takes into account the life of the project. Dividing this total daily worker VMT by the average number of daily workers gives an average daily VMT per worker of 5.4 over the life of the project, as shown in Table 5.14-4.

According to the Alameda County Transportation Commission model, the existing regional VMT per employee for Alameda County is 15.0. The significance threshold is 85 percent of the existing regional VMT, or 15 percent below the existing regional VMT, hence 12.8 VMT per employee. Therefore, the normalized daily VMT per worker of 5.4 VMT per worker estimated for the project's construction is below the regional threshold of VMT per employee (12.8). As a result, the construction phase of the project would result in a less than significant VMT impact.

For the above reasons, the construction of the proposed project would not conflict or be inconsistent with CEQA Guidelines Sections 15064.3(b)(1), and transportation impacts would be less than significant.

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TABLE 5.14-4 TOTAL WORKER VMT DURING CONSTRUCTION PHASE FOR POTENTIA-VIRIDI				
Phase	Worker Trips per Day (2 trips/worker)	Average Miles per Trip	Duration (days)	VMT per Phase
Site Preparation	50	26	40	52,000
Civil Work and Grading	110	26	120	343,200
Foundations and Underground Equipment	100	26	80	208,000
BESS Equipment Installation	160	26	100	416,000
Project Substation Installation	40	26	160	166,400
Gen-Tie Foundations and Structure Erection	28	26	40	29,120
Gen-Tie Line Stringing and Pulling	24	26	10	6,240
Testing and Commissioning	52	26	110	148,720
PG&E Interconnection Facility Upgrades with Tesla Substation	40	26	130	135,200
Decommissioning	40	26	150	156,000
TOTAL				1,660,880

TABLE 5.14-5 DAILY AVERAGE WORKER VMT DURING CONSTRUCTION FOR POTENTIA-VIRIDI	
Item	Amount
Worker VMT during Construction (from Table 5.14-5)	1,660,880
Project Life (35 years, expressed in days)	9,100
Daily Worker VMT (total divided by number of days)	183
Average Daily Number of Workers over Life of Construction	34
Average VMT per Worker (daily VMT divided by number of workers)	5.4
Alameda County average VMT/Employee (from ACTC travel model)	15.0
Threshold of Significance (15% below Alameda County average)	12.8

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DATA REQUESTS

A113. Please provide a calculation of average daily VMT per construction worker, in accordance with the method shown above.

A114. Please provide a discussion of the assumptions and methods used for the construction worker VMT calculation, including assumptions for origin of employee trips.

BACKGROUND

Construction trips, both by workers and heavy haul trucks, could potentially obstruct roadways or cause hazards.

DATA REQUESTS

A115. Please provide approximate average daily and peak construction number of construction workers and heavy haul truck trips, as well as their approximate distribution throughout the day.

A116. Please provide an LOS analysis showing intersection and roadway LOS before and during construction.