

DOCKETED

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

Data Response Set 5

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

Submitted to
California Energy Commission

Submitted by
Los Esteros Critical Energy Facility, LLC

August 2026

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

Los Esteros Critical Energy Facility (LECEF), LLC, on behalf of Tanager Power, LLC, provides the following responses to the California Energy Commission (CEC) Staff's Data Requests Set 5, Data Requests A111 through A116 for the Tanager Battery Energy Storage System (BESS).

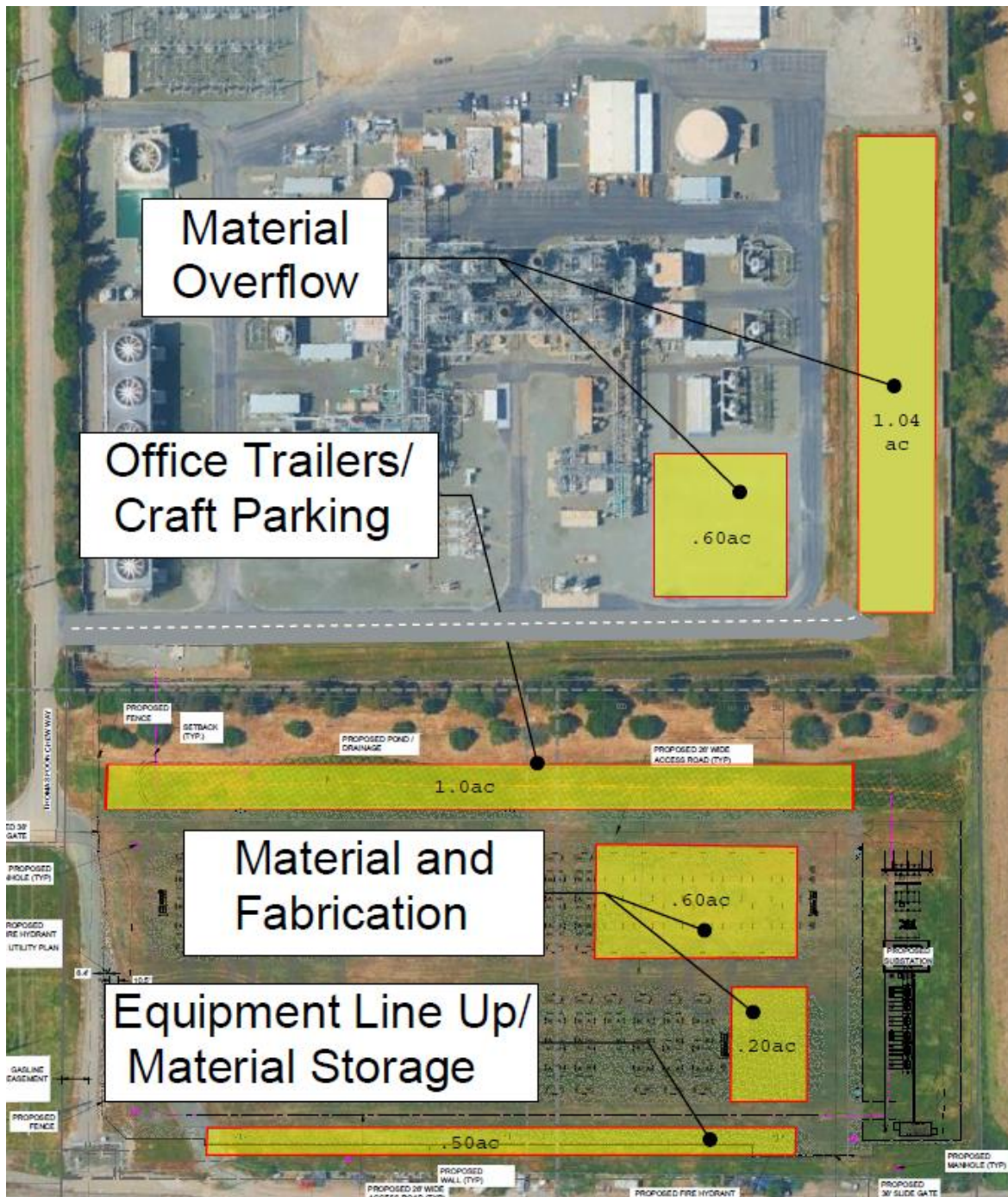
The responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as presented in CEC Staff's Data Requests Set 5 and are keyed to the Data Request numbers.

LAND USE

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.*

RESPONSE: The Project will utilize available space at the Los Esteros Critical Energy Facility and available space within the Tanager site itself for laydown and parking, with the currently expected laydown areas highlighted below.

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

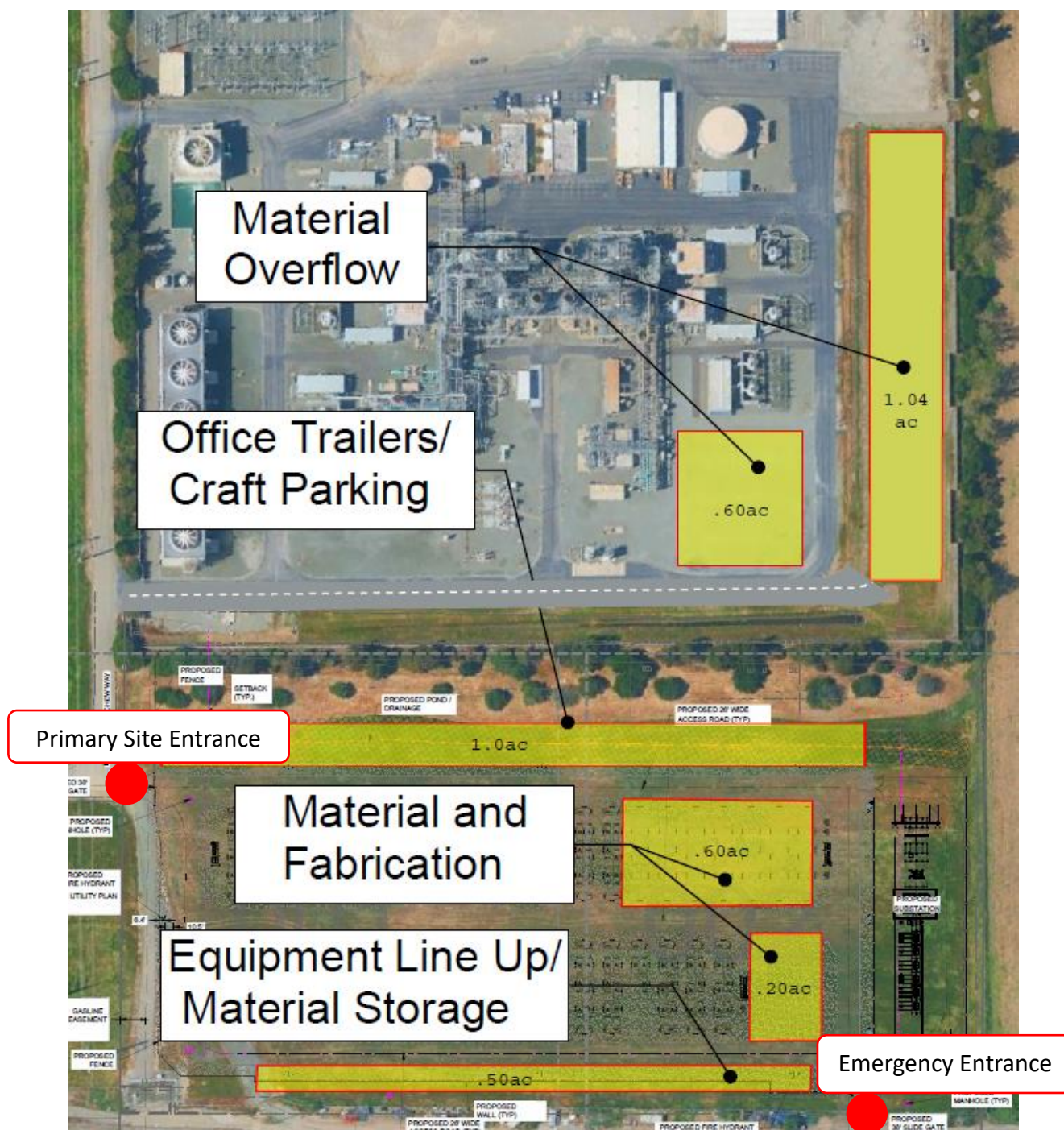


A112. *Please correct the conflicting statement that there would be no additional site access.*

RESPONSE: The current design includes two Project access points, utilizing Thomas Foon Chew Way to access the primary site entrance and Alviso Milpitas Road to access an emergency site entrance. Site entries are illustrated below with red

DATA RESPONSE SET 5

circles. Locations of site access points will also be included in final Project design.



LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

TRANSPORTATION

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

RESPONSE: Construction worker vehicle miles traveled (VMT) were estimated using the method identified in CEC Staff's Data Request Set 5 that was based on the Potentia-Viridi BESS project Staff Assessment (CEC, 2026¹). The calculation considers construction worker commute trips only and excludes material delivery trucks and other heavy-haul construction vehicles.

As described in Tanager's Data Response Set 4A (DR A90), construction is expected to occur over approximately 12 months with an average monthly workforce of approximately 74 workers. Construction workers would make two commute trips per day (one inbound and one outbound). The VMT analysis assumes an average one-way commute distance of approximately 26 miles, consistent with the regional labor market assumptions used in comparable Bay Area BESS transportation analyses. Table DRA113-1 Summarizes the calculated VMT based on the duration and number of worker trips during each of the construction phases.

TABLE DRA113-1

Phase	Worker Trips per Day (2 trips/worker)	Average Miles per Trip	Duration (days)	VMT per Phase
Demolition and Site Preparation	50	26	28	36,400
Grading	86	26	24	53,664
Concrete and Battery Placement	183	26	241	1,143,545
Paving and Architectural Coating	89	26	32	74,048
TOTAL			325	1,307,657

Daily worker trips and trip lengths were multiplied for each phase of project construction 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.

¹ California Energy Commission. 2026. Potentia-Viridi Battery Energy Storage System Staff Assessment. 24-OPT-04, TN 268314.

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

The total worker VMT over the construction period was normalized over the 35-year project life, which was estimated to be 9,100 days², to calculate a total daily worker VMT. An average daily VMT of 2 miles per worker over the life of the project was calculated by dividing the total daily worker VMT by the average number of daily workers as shown on Table DRA113-2.

TABLE DRA113-2

Description	Value
Worker VMT during Construction (from Table DRA113-1)	1,307,657
Project Life (35 years, expressed in days)	9,100
Daily Worker VMT (total divided by number of days)	144
Average Daily Number of Workers over Life of Construction	74
Average VMT per Worker (daily VMT divided by average daily number of workers)	2
Regional employee VMT threshold used by the City of San José (2021 Industrial VMT)	14.37 (18.59)

The 2021 Industrial VMT associated with the project location (City of San Jose 2021³) is 18.59 VMT per employee. The calculated VMT per worker for the Tanager BESS project is 2. This value is substantially below the threshold of significance used by the City of San Jose (14.37 VMT) and approximately 86 percent below the 2021 Industrial VMT threshold for the project location. Therefore, construction worker VMT associated with the Project would result in a less-than-significant transportation impact.

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

RESPONSE: Construction-worker VMT was calculated using the methods described by CEC staff in Data Request Set 5 using workforce assumptions previously provided in response to Data Request A90, which was submitted as part of Set 4A. The analysis considers only worker commute trips because CEQA Guidelines section 15064.3 defines VMT in terms of passenger vehicle travel and CEC staff specifically requested evaluation of construction worker trips. Consistent with the Staff Assessment analysis for the Potentia-Viridi BESS

² Total number of days assumes 260 working days per year for 35 years

³ City of San Jose. 2021. Industrial Job VMT Interactive Map. Accessed at <https://www.sanjoseca.gov/your-government/departments-offices/transportation/policies/vehicle-miles-traveled-metric>.

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

project, the total construction VMT was normalized over the life of the project because the daily worker trips during operation would be negligible.

As previously disclosed, construction workers are expected to be drawn primarily from the existing Bay Area labor market, including Santa Clara County and surrounding counties. Approximately 80 to 90 percent of construction workers are expected to reside within the regional labor market, with the remaining workforce consisting of specialized personnel, vendor representatives, supervisory staff, and other workers who may be sourced from outside the immediate area.

The VMT calculation assumed:

- An average daily construction workforce of approximately 74 workers with a peak workforce of 112 workers.
- Two worker trips per day (arrival and departure).
- An average one-way commute distance of 26 miles, consistent with the regional commute-distance assumption used in comparable Bay Area BESS transportation analyses.
- Approximately 12 months of construction activity (325 workdays).
- Normalization of total construction-worker VMT over the Project's anticipated 35-year operational life to derive average daily VMT per worker.

Because the Project would rely primarily on an existing regional workforce and would not induce substantial population growth or relocation of workers, construction-related worker VMT would be temporary and limited in duration. Consistent with the calculation presented above, the resulting average daily VMT per worker is substantially below the applicable regional employee VMT benchmark and would not result in a significant transportation impact when evaluated over the life of the project.

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.*

RESPONSE: As identified in the response to Data Request A90 submitted to the CEC in Set 4A, the Project is expected to employ an average construction workforce of approximately 74 workers and a peak workforce of approximately 112 workers during major electrical installation, battery equipment installation, and commissioning activities. Construction would occur over an

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

approximately 12-month period following initial mobilization. The peak construction period of the project, when the highest volumes of construction-related traffic would be generated, is planned to occur over a four-month period, when multiple phases of project construction would occur concurrently. Generally, construction work schedules are expected to be at least 8 hours per day Monday through Friday, excluding federal holidays. Construction hours would comply with City of San Jose noise ordinances (Chapter 10.16 of the Municipal Code) that allow construction work between 7 AM and 7 PM Monday through Friday and 8 AM to 5 PM on Saturday and Sunday.

The workday would consist of one shift beginning as early as 6 AM and ending as late as 7 PM. The work schedule may be modified throughout the year to account for changing weather conditions. To provide a conservative analysis, all construction workers were assumed to arrive inbound to the site during the AM peak period (7 AM to 9 AM) and all workers were assumed to depart the site during the PM peak period (4 PM to 6 PM). The construction worker daily trips are based on the peak estimate of 112 workers presented in response to Data Request A90 (Table A90-2). Truck deliveries are typically sporadic throughout the workday; therefore, truck arrivals and departures were assumed to be distributed evenly over the course of an 8-hour workday. Most material deliveries would occur outside the peak worker arrival and departure periods to minimize congestion and improve site access and safety.

Table DRA115-1 presents a summary of the anticipated peak construction period trip generation for the Project, using the conservative assumptions above.

Table DRA115-1. Construction Trip Generation

Trip Type	Daily Trips	AM Peak Period (7 AM to 9 AM)			PM Peak Period (4 PM to 6 PM)		
		In	Out	Total	In	Out	Total
Construction Workers	224	112		112		112	112
Vendor Trucks	12	6		6		6	6
Haul Trucks	100	13	13	26	13	13	26
Total Construction Trips	336	131	13	144	13	131	144

In accordance with TRANS-1, a Traffic Control Plan will be implemented prior to construction and will include worker arrivals and departures outside peak periods to minimize traffic impacts.

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

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

RESPONSE: A qualitative level of service (LOS) assessment was performed using traffic information from the adjacent north San José transportation study area (Hexagon Transportation Consultants 2021⁴) prepared for the adjacent industrial project. The 2021 transportation analysis determined that the study intersections on Zanker Road operated at acceptable LOS conditions (LOS “B”) under the baseline conditions. The adjacent project was estimated to produce 369 daily trips, including 41 trips during the AM peak period and 34 trips during the PM peak period. The Hexagon study concluded that the Zanker Road intersections would continue to operate at a LOS B.

Construction of the Project would generate a similar number of daily trips (336) as the adjacent industrial/data-center development evaluated in the Hexagon Transportation Consultants study (2021). Traffic from the Project construction would primarily affect traffic at the following intersections:

- 1) SR 237 westbound offramp at Zanker Road (signalized intersection)
- 2) SR 237 eastbound offramp at Zanker Road (signalized intersection)
- 3) Zanker Road intersection with Thomas Foon Chew Way (two-way stop-controlled intersection)

Assuming, conservatively, that the traffic impacts from the data center outlined in the Hexagon report were doubled to account for construction of both projects concurrently, impacts to the 237 off-ramps would be as follows:

TABLE DRA116-1

	Peak Period	Delay with Data Center Project (sec)	Estimated Total Impact with Project Construction (sec)	LOS
Zanker Rd at SR 237 EB Ramps	AM	15.4	30.8	C
Zanker Rd at SR 237 EB Ramps	PM	11.4	22.8	C
Zanker Rd at SR 237 WB Ramps	AM	11.7	23.4	C
Zanker Rd at SR 237 WB Ramps	PM	14.3	28.6	C

The calculated LOS in the above table is based on standard Level of Service definitions, provided below. The City of San José considers LOS D or better to be acceptable operation.

TABLE DRA116-2

Service	Signalized Intersection	Intersection without Signal
A	Uncongested operations, all queues clear in a signal- signal cycle, Delay < 10 sec	Little or no delay. Delay < 10 sec/vh

⁴ Hexagon Transportation Consultants, Inc. 2021. San Jose Data Center (SJC02) Draft Transportation Analysis. Prepared for FirstCarbon Solutions. June 9.

LOS ESTEROS CRITICAL ENERGY FACILITY (03-AFC-02C)
Petition for Modification- Tanager BESS Project
DATA RESPONSE SET 5

B	Uncongested operations, all queues clear in a signal- signal cycle, Delay < 10 sec and < 20 sec	Short traffic delays. Delay >10 sec/veh and < 15 sec/veh
C	Light congestion, occasional backups on critical approaches. Delay > 20 sec and < 35 sec	Average traffic delays. Delay >15 sec/veh and < 25 sec/veh
D	Significant congestions of critical approaches but intersection functional, Cars required to wait through more than one cycle during short peaks, No long queues formed, Delay > 25 sec and < 55 sec	Long traffic delays. Delay >25 sec/veh and < 35 sec/veh
E	Severe congestion with some long-standing queues on critical approaches, Blockage of intersection may occur if traffic signal does not provide for protected turning movements, Traffic queue may block nearby intersection(s) upstream of critical approaches. Delay >55 sec and < 80 sec	Very long traffic delays, failure, extreme congestions, Delay >35 sec/veh and < 50 sec/veh
F	Total breakdown, stop-and- go operation. Delay > 80 sec	Intersection blocked by external causes, Delay >50 sec/veh

Construction traffic associated with the Project would consist primarily of worker commute trips and periodic delivery vehicles using the existing roadway network serving the LECEF facility, which includes Zanker Road and Thomas Foon Chew Way. The peak period estimates in Table DRA 115-1 conservatively assume all workers arriving and leaving the Project site during peak hours for the analysis. As outlined in TRANS-1, a Traffic Control Plan will be implemented prior to construction and will include provisions to shift worker arrivals and departures outside peak hours to minimize potential LOS impacts.