

APPENDIX C – AGRICULTURAL RESOURCES AND FISCAL IMPACT

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C.1. Land Evaluation and Site Assessment Analysis (LESA) for the Westside Canal Battery Storage Project



**Land Evaluation and
Site Assessment Analysis
for the Westside Canal
Battery Storage Project,
Imperial County, California**

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A handwritten signature in black ink, appearing to read "Nick Larkin", written in a cursive style.

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Acronyms and Abbreviations

BLM	Bureau of Land Management
CAISO	California Independent System Operator
CEQA	California Environmental Quality Act
IID	Imperial Irrigation District
IV Substation	Imperial Valley Substation
LCC	Land Capability Classification
LE	Land Evaluation
LESA	Land Evaluation and Site Assessment Analysis
MW	megawatt
MWh	megawatt per hour
NRCS	Natural Resources Conservation Service
O&M	Operations and Maintenance
Project	Westside Canal Battery Storage Project
Project Proponent	Westside Canal Battery Storage, LLC
SA	Site Assessment
USDA	U.S. Department of Agriculture
ZOI	Zone of Influence

1.0 Introduction

As stated in Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Land Evaluation and Site Assessment (LESA) model is intended to provide lead agencies with an optional methodology to ensure significant effects on the environment of agricultural land conversion are quantitatively and consistently considered in the environmental review process. The model provides an approach for rating the relative quality of land resources using a point-based evaluation composed of six different factors. Land Evaluation factors are based upon measures of soil resource quality including Land Capability Classification (LCC) and Storie Index, while Site Assessment factors are evaluated based on a project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, each of these factors is rated on a 100-point scale. Each factor has relative weights that are combined into one numeric score. That score is then evaluated against the scoring thresholds provided in the LESA Model instruction manual. The project's LESA model score is used to make a determination of the potential significance of the conversion of agricultural lands (California Department of Conservation 1997).

The following LESA Model was prepared for the proposed Westside Canal Battery Storage Project (Project), and the results are provided below.

2.0 Project Description

Westside Canal Battery Storage, LLC (Project Proponent), a subsidiary of Con Edison Clean Energy Businesses is proposing to develop, design, construct, own, operate, and maintain the Westside Canal Battery Storage Project (Project), a utility-scale energy storage complex with a capacity of up to 2,000 megawatts (MW). The Project would store energy generation from the electrical grid, and optimally discharge that energy back into the grid as firm, reliable generation and/or grid services.

The Project would be comprised of lithium-ion battery and/or flow battery energy storage facilities, a behind-the-meter solar energy facility, a new on-site 230 kilovolt (kV) loop-in switching station, a 34.5 kV to 230 kV substation, underground electrical cables, and permanent vehicular access to and from the site over a proposed bridge spanning Imperial Irrigation District's (IID's) Westside Main Canal. The proposed loop-in switching station would connect the Project to the existing IID Campo Verde-Imperial Valley 230 kV radial gen-tie line, which connects to the Imperial Valley Substation (IV Substation) and the California Independent System Operator (CAISO), approximately one-third mile south of the Project site. The Project Proponent has submitted the necessary Interconnection Request Applications to the CAISO and IID.

The Project would complement both the existing operational renewable energy facilities, as well as those planned for future development in the County, and would support the broader Southern California bulk electric transmission system by serving as a firm, dispatchable resource.

The Project is pursuing the following objectives:

- To receive grid energy during beneficial market and operational periods and store that energy for future dispatch when the customer (i.e., a load-serving entity) deems it to be more valuable.
- To be a valuable resource in allowing the customer and system operators to manage the effect of intermittent renewable generation on the grid and create reliable, dispatchable generation upon demand.
- To utilize available land that has not been used for agricultural production for more than 15 years and enhance the site location by providing for permanent vehicular access.

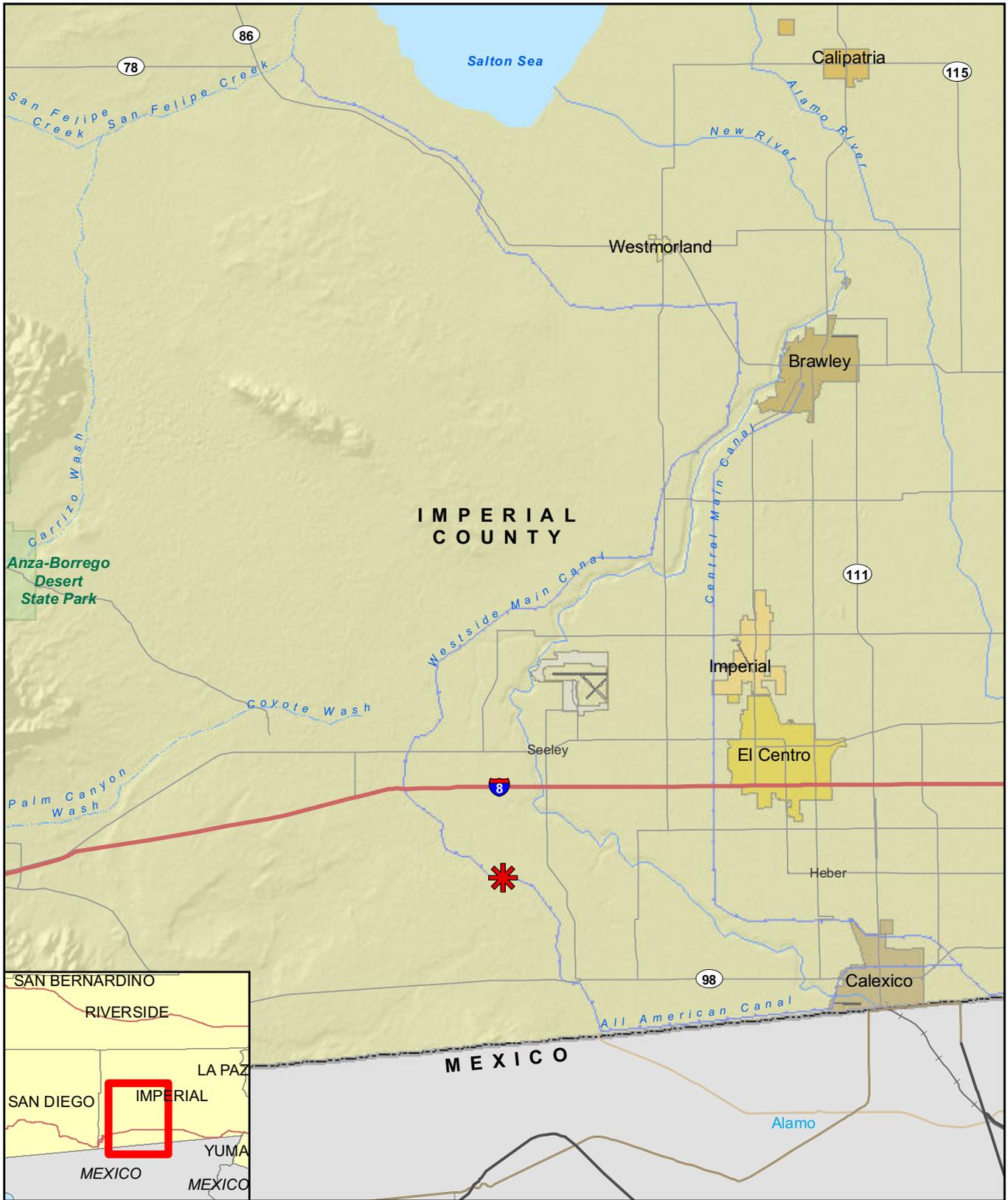
2.1 Environmental Setting

The Project site was previously graded and used as farmland and has been fallow for more than 15 years. The General Plan land use designation and zoning for the Project site and all surrounding parcels to the north and east is Agriculture (A3). The General Plan land use designation for parcels to the south and west are designated open space/recreation areas; zoning does not apply to these Bureau of Land Management (BLM) lands. The Campo Verde solar generation facility is located north of the Project site and agricultural uses are located northeast of the Project site. Parcels farther north of the Project site also include a mix of agricultural uses and solar generation facilities. The parcel immediately east of the Project site is undeveloped. BLM land south and west of the Project site is generally undeveloped, relatively flat, and barren. The IV Substation is located approximately one-third mile south of the southern property line of the site.

2.2 Project Characteristics

2.2.1 Project Location

The Project would be located in the unincorporated Mount Signal area of the County, approximately 8.0 miles southwest of the city of El Centro and approximately 5.3 miles north of the U.S.-Mexico border. Figure 1 shows the regional location of the Project. The Project site is comprised of two parcels owned by the Project Proponent, Assessor Parcel Number (APN) 051-350-010 and APN 051-350-011, totaling approximately 148 acres. These parcels have limited access corridors for vehicular traffic and are considered less desirable for agricultural production, as reflected by the last 15 years during which no farming activity has occurred.



 Project Location

FIGURE 1
Regional Location

The Project site is approximately one-third mile north of the IV Substation and directly south of the intersection of Liebert Road and the IID's Westside Main Canal. The Project site is bounded by the Westside Main Canal to the north, BLM lands to the south and west, and vacant private land to the east. The Campo Verde solar generation facility is located north of the Project site, across the Westside Main Canal. Figure 2 shows the Project site on a U.S. Geological Survey Map. Figure 3a shows an aerial photograph of the Project site and the above-mentioned nearby facilities.

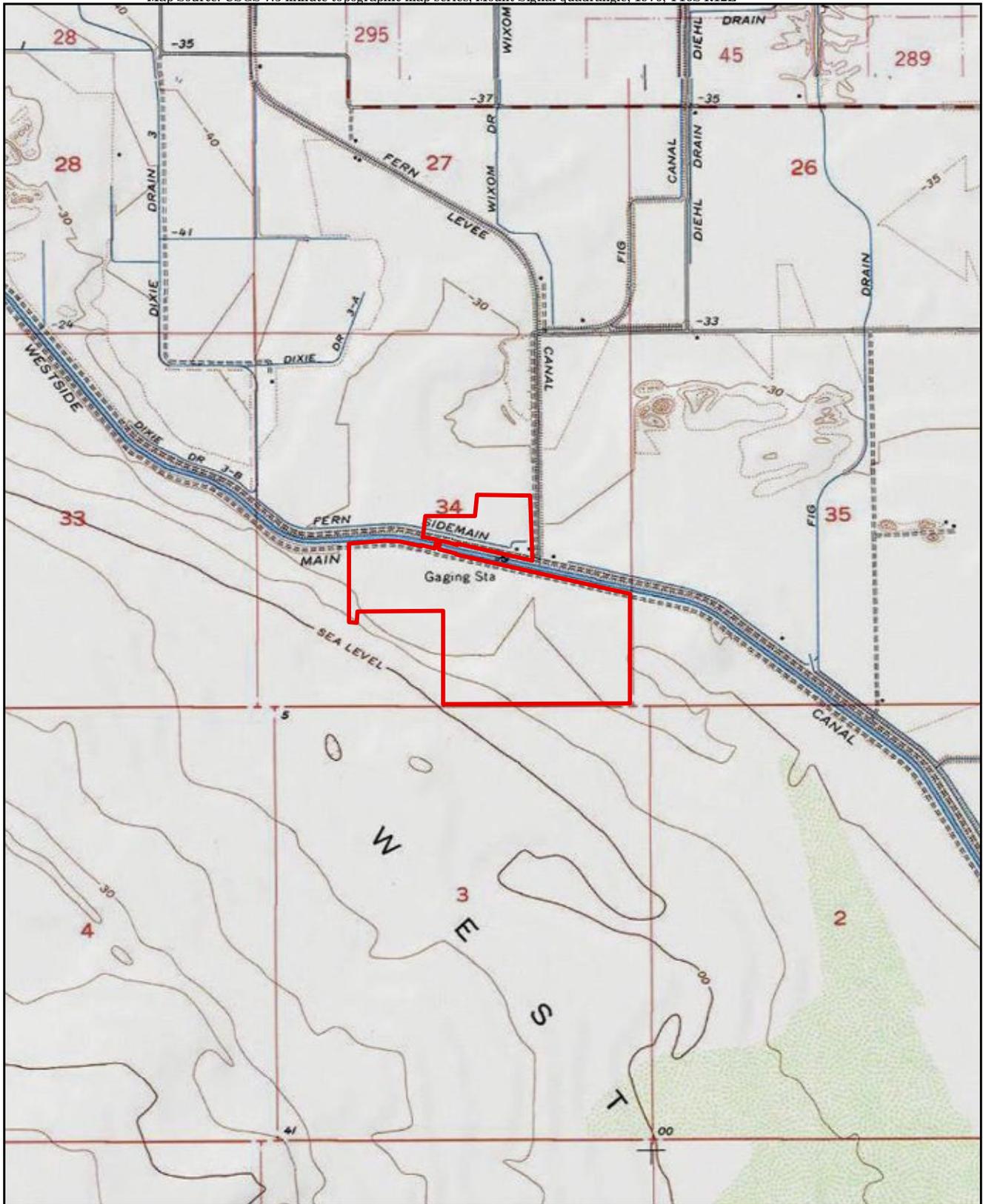
The two Project parcels are proposed for development as a utility-scale energy storage complex. The Project would also utilize portions of two parcels located north of the Westside Main Canal (APN 051-350-019 owned by IID and APN 051-350-018 owned by a private land owner) for site access and as a temporary construction staging area. The Project would also access a small portion of APN 051-350-009 within an IID easement for connection to the existing IID Campo Verde Imperial Valley 230 kV radial gen-tie line during the construction of a substation on the Project site. The total proposed Project development footprint, encompassing both temporary and permanent impacts, would be approximately 163 acres.

2.2.2 Project Components

The Project would be constructed in three to five phases over a 10-year period, with each phase ranging from approximately 25 MW up to 400 MW per phase. Depending on the size of the battery system for a given phase, construction and commissioning (approval to operate) is anticipated to take approximately 6 to 12 months. For the purposes of this analysis, the applicant has assumed that construction activities would last for approximately 32 months to complete the full Project build-out.

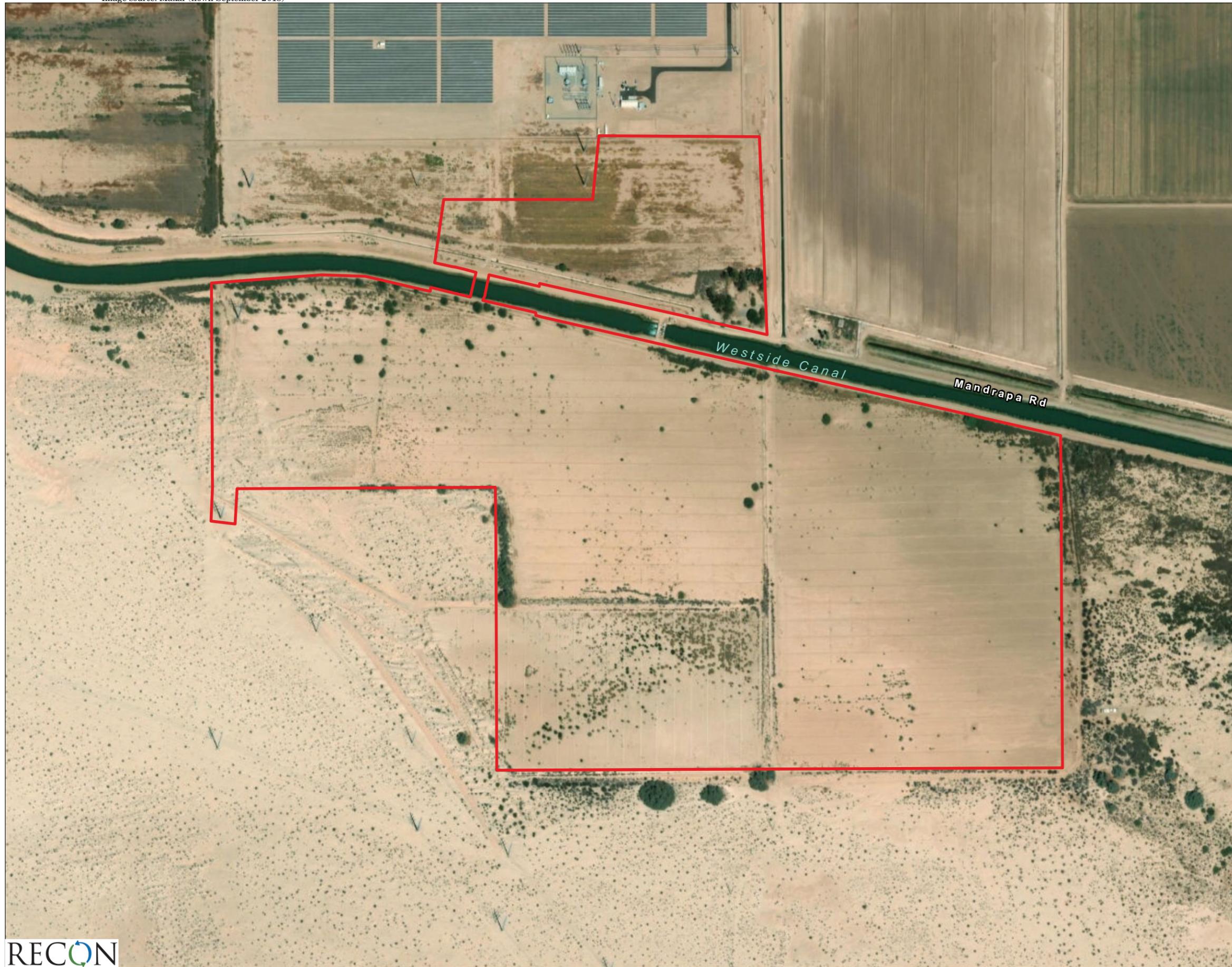
Construction of the 100- to 200- MW first phase would include roads, a permanent clear-span bridge across the Westside Main Canal, Operations and Maintenance (O&M) facilities, water connections and water-mains, storm water retention, switching station and Project substation, legal permanent vehicle access, as well as the first energy storage facility. To access the Project site, construction workers would travel along Interstate 8 (I-8) and head 4.6 miles south to the Project site, and would utilize the IID Fern Check Bridge as a temporary pedestrian bridge until the permanent bridge is constructed. During peak construction activities, approximately 200 workers and approximately 30 daily deliveries would be required. It is anticipated that construction of the first phase would begin in 2021.

It is anticipated that each subsequent phase would be constructed within one to two years of each other, with the timing and size of each phase dependent on market conditions and the applicant's ability to secure commercial contracts with prospective customers. With the Project being built in phases, the necessary infrastructure, such as water mains, retention ponds, and access roads, would be built out to serve the Project phases from west to east and expanded over time to serve each phase. These subsequent phases would require improvements such as additional substation equipment, water main and site road extension, but would not require construction of additional common facilities which would be completed during the first phase. The total nameplate capacity (or rated capacity) of the Project at full build-out (all phases completed) would be approximately 2,000 MW. On-site photovoltaic solar generation would serve as station auxiliary power and be deployed throughout the Project site, constructed during each phase.



 Project Boundary

FIGURE 2
Project Location on USGS Map



 Project Boundary



FIGURE 3a
Project Location on
Aerial Photograph

Construction activities during all Project phases would only occur Monday through Friday, between the hours of 7:00 a.m. and 7:00 p.m. or Saturday between the hours of 9:00 a.m. and 5:00 p.m., excluding holidays, per County Ordinance.

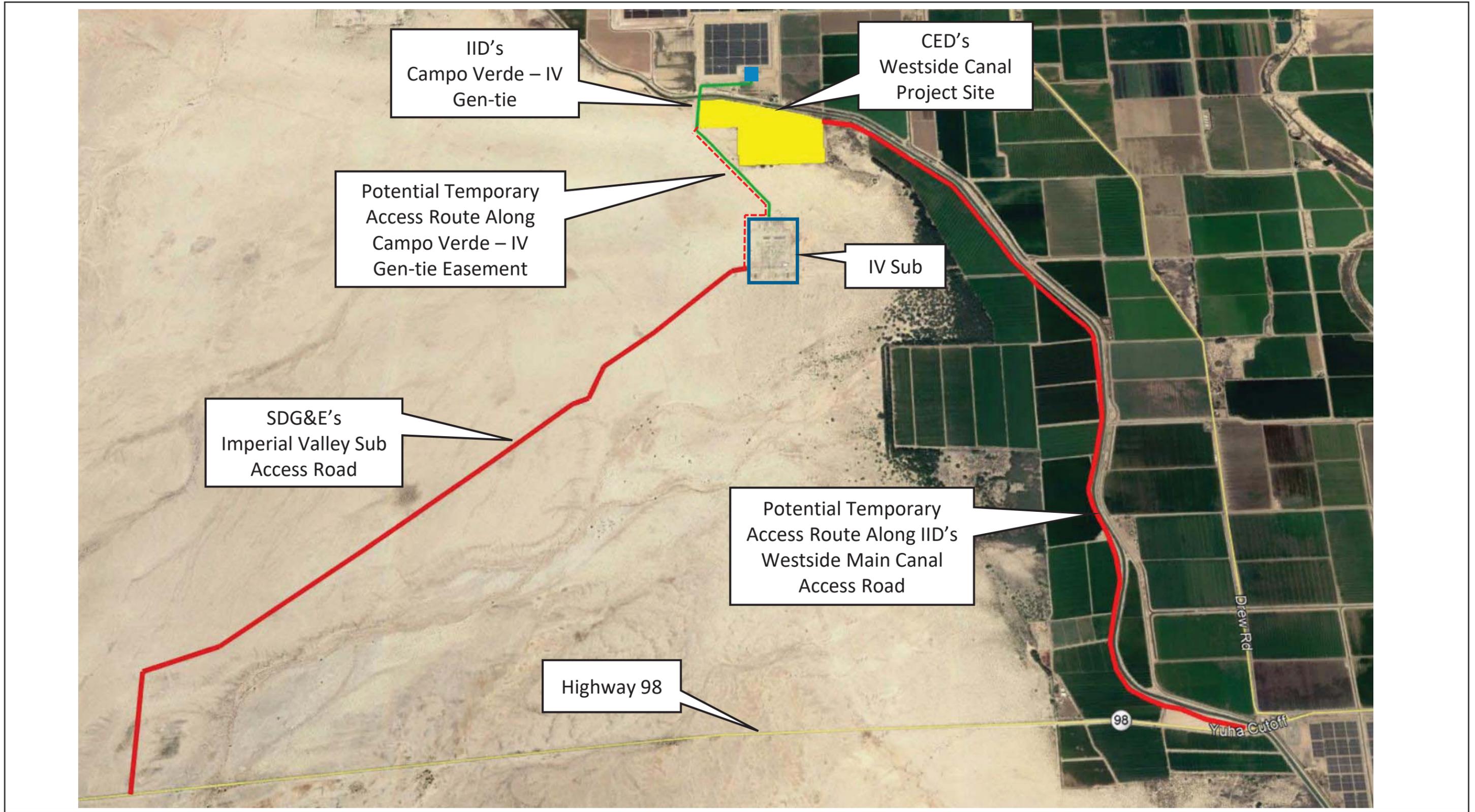
Due to the Project site having no direct vehicular access routes, the applicant is proposing to construct roads on both the north and south sides of the Westside Main Canal on private land, and a new clear-span Imperial County/-specified bridge over the Westside Main Canal. The permanent new clear-span County-specified bridge would span the Westside Main Canal to connect to a proposed access road easement on the north side of the Westside Main Canal. The north side proposed access road would ultimately connect the Project to county road (CR) Liebert Road.

Construction of the permanent clear-span bridge spanning the IID's Westside Main Canal requires the Project Proponent to have access to both the north side and the south of the canal to perform the necessary construction activities. In addition to being necessary to facilitate construction of the new permanent clear-span bridge, access from the south side of the canal would allow the Project Proponent to commence construction on the first phase of the Project simultaneously, thereby shortening the duration of construction and potentially minimizing the associated impacts. The Project Proponent is evaluating various options for temporary construction access, including accessing the Project site from the south side of the Westside Main Canal off of State Route 98, as well as options involving access from the north side of the Westside Main Canal from I-8.

Option 1 would use the existing SDG&E maintenance road off Highway 98, which extends approximately 4.4 miles to the IV Substation. Option 1 would then continue along an existing 1.2-mile-long dirt access road that leads north, then east, outside the western and northern boundaries of the substation. Option 1 then continues northwest along an existing dirt access road that parallels two power lines until the access road connects with the western edge of the Project. The existing dirt road was constructed for the construction and maintenance of the existing Centinela gen-tie line. Option 2 would use the existing IID Westside Mail Canal access road. The selected temporary access option would be used until construction of the permanent bridge is completed. Both temporary construction access routes are presented in Figure 3b. Temporary use of these access routes using existing utility roads within existing utility easements would not result in any permanent impacts to land uses or soils. Therefore, an impact analysis of these temporary access routes has not been included in this LESA.

3.0 Land Evaluation and Site Assessment Evaluation

The Project site was evaluated using the 1997 California LESA Model to rate the quality and availability of agricultural resources and to identify whether the Project would meet the threshold criteria as having a significant impact to Agricultural Resources under CEQA Guidelines. The LESA evaluates land use and site assessment factors to identify if the Project would result in a significant agricultural resources impact. Each LESA Model factor is evaluated in the following sections.



3.1 Land Evaluation

The land evaluation portion of the LESA Model focuses on two components of soil quality: the LCC Rating and the Storie Index Rating.

The LCC indicates the suitability of soils for most kinds of crops. Soils are rated from Class I to Class VIII, with soils having the fewest limitations receiving the highest rating. Class I soils have no significant limitation for raising crops. Classes VI through VIII have severe limitations, limiting or precluding their use for agriculture. Capability subclasses are also assigned by adding a small letter to the class designation. Capability subclasses include the letters e, w, s, or c. The letter e shows that the main limitation is risk of erosion. The letter w indicates that water in or on the soil interferes with plant growth or cultivation. The letter s indicates that the soil is limited mainly because it is shallow, droughty, or stony. Finally, the letter c is used only in some parts of the United States where cold or dry climates are a concern. Groupings are made according to the limitation of the soils when used to grow crops and the risk of damage to soils when they are used in agriculture.

The Storie Index provides a numeric rating (based upon a 100 point scale) of the relative degree of suitability or value of a given soil for intensive agriculture use. This rating is based upon soil characteristics only (California Department of Conservation 1997). The Storie Index assesses the productivity of a soil from the following four characteristics: degree of soil profile development; texture of the surface layer; slope; and manageable features, including drainage, microrelief, fertility, acidity, erosion, and salt content. A score ranging from 0 to 100 is determined for each factor, and the scores are multiplied together to derive an index rating. For simplification, Storie Index ratings have been combined into six grade classes as follows: Grade 1 (excellent), 81 to 100; grade 2 (good), 61 to 80; grade 3 (fair), 41 to 60; grade 4 (poor), 21 to 40; grade 5 (very poor), 11 to 20; and grade 6 (nonagricultural), 10 or less (U.S. Department of Agriculture Natural Resources Conservation Service 2017).

Review of the U.S. Department of Agriculture Soil Survey Map Sheet CA683 identified the following eleven soil types on the Project site (U.S. Department of Agriculture Natural Resources Conservation Service 2013).

- Glenbar Complex
- Holtville Silty Clay, Wet
- Indio-Vint Complex
- Meloland Fine Sand
- Meloland Very Fine Sandy Loam, Wet
- Vint And Indio Very Fine Sandy Loams, Wet
- Vint Loamy Very Fine Sand, Wet
- Imperial-Glenbar Silty Clay Loams, Wet, 0-2% Slopes
- Rositas Fine Sand, Wet, 0-2% Slopes
- Rositas Fine Sand, 0-2% Slopes
- Water

Figure 4 presents the distribution of these eleven soil types on the Project site. The LESA Model assigns LCC scores to each soil by multiplying the soils’ LCC Rating by the soils’ proportion of the Project site. Similarly, the Storie Index score is calculated by multiplying the soils’ Storie Index rating by the soils’ proportion of the Project site. Table 1 presents the calculations for the Project sites’ LCC and Storie Index scores, which together constitute the Project sites’ Land Evaluation (LE) scores. The final LE and Site Assessment (SA) scores are entered into the Final LESA Score Sheet presented in Table 7 (see Section 4.0).

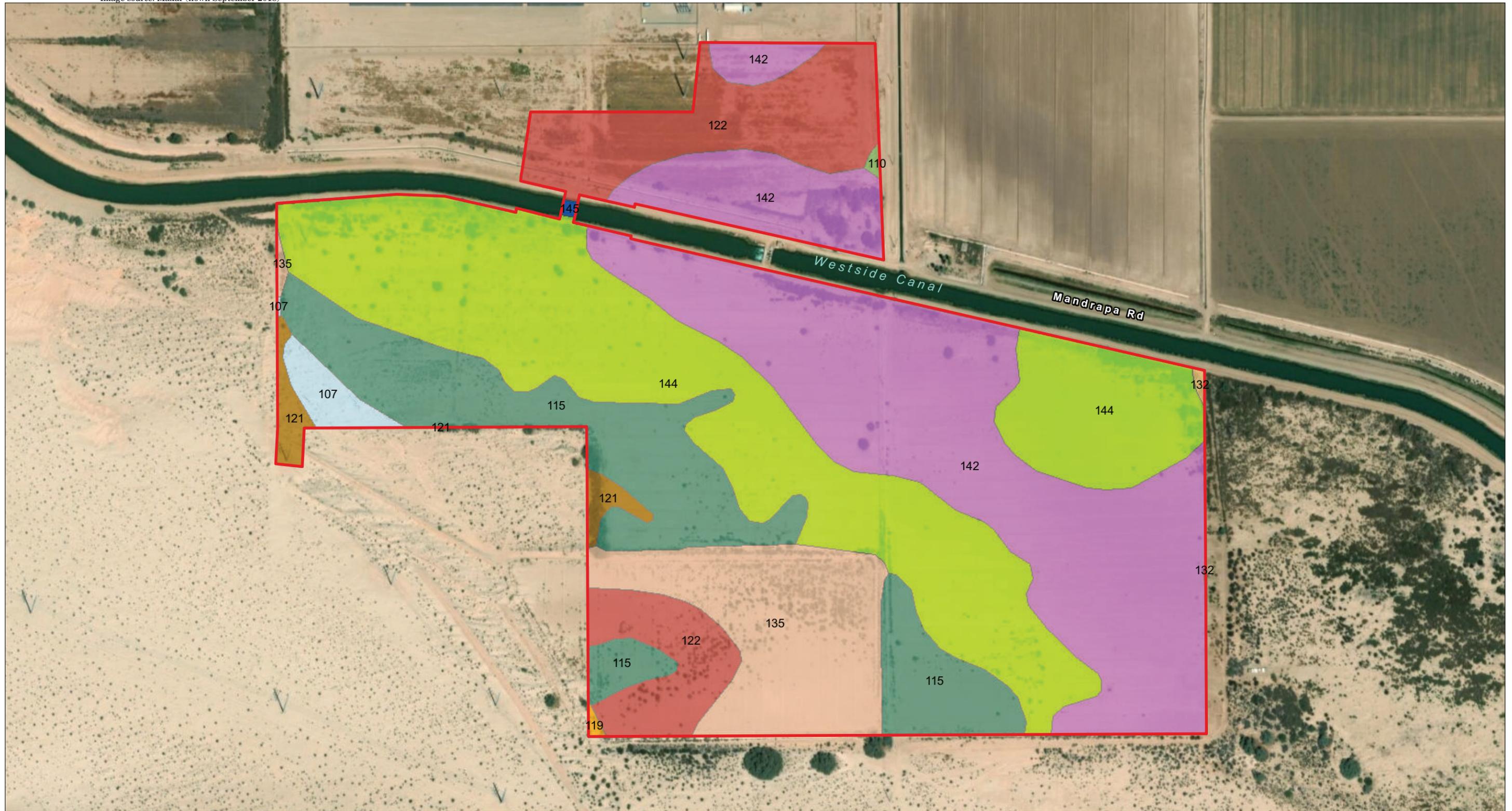
Table 1 Land Capability Classification and Storie Index Score							
A	B	C	D	E	F	G	H
Soil Map Unit	Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
Glenbar Complex	1.96	1.2%	III _s	60	0.7	52	0.6
Holtville Silty Clay, Wet	0.15	0.1%	II _w	80	0.1	30	0.0
Indio-Vint Complex	0.13	0.1%	II _e	90	0.1	90	0.1
Meloland Fine Sand	2.00	1.2%	III _e	70	0.9	47	0.6
Meloland Very Fine Sandy Loam, Wet	18.17	11.1%	III _w	60	6.7	43	4.8
Vint And Indio Very Fine Sandy Loams, Wet	51.60	31.6%	II _w	80	25.3	60	19.0
Vint Loamy Very Fine Sand, Wet	49.90	30.6%	II _w	80	24.4	57	17.4
Imperial-Glenbar Silty Clay Loams, Wet, 0-2% Slopes	23.66	14.5%	III _w	60	8.7	34	4.9
Rositas Fine Sand, Wet, 0-2% Slopes	15.48	9.5%	III _w	60	5.7	36	3.4
Rositas Fine Sand, 0-2% Slopes	0.16	0.1%	III _e	70	0.1	62	0.0
Water	0.09	0.1%	N/A	0	0.0	0	0.0
Total	163.32	100.0%	--	LCC Total	64.2	Storie Index Total	44.7

NOTE: Totals may vary due to independent rounding.
LCC = Land Capability Classification

3.2 Site Assessment Factors

The California LESA Model includes four Site Assessment factors that are separately rated and include the following:

- Project Size Rating;
- Water Resources Availability Rating;
- Surrounding Agricultural Land Rating; and
- Surrounding Protected Resource Land Rating (California Department of Conservation 1997).



 Project Boundary

Soil Classification

- 107 - Glenbar Complex - 2.0 ac. (1.2%)
- 110 - Holtville Silty Clay, Wet - 0.2 ac. (0.1%)
- 115 - Imperial-Glenbar Silty Clay Loams, Wet, 0-2% Slopes - 23.7 ac. (14.5%)
- 119 - Indio-Vint Complex - 0.1 ac. (0.1%)

- 121 - Meloland Fine Sand - 2.0 ac. (1.2%)
- 122 - Meloland Very Fine Sandy Loam, Wet - 18.2 ac. (11.1%)
- 132 - Rositas Fine Sand, 0-2% Slopes - 0.2 ac. (0.1%)
- 135 - Rositas Fine Sand, Wet, 0-2% Slopes - 15.5 ac. (9.5%)
- 142 - Vint Loamy Very Fine Sand, Wet - 49.9 ac. (30.6%)
- 144 - Vint And Indio Very Fine Sandy Loams, Wet - 51.6 ac. (31.6%)
- 145 - Water - 0.1 ac. (0.1%)



FIGURE 4
Project Soil Types

3.2.1 Project Size Rating

The Project Size rating is utilized to recognize the role that farm size plays in the viability of commercial agricultural operations. In general, larger farming operations can provide greater flexibility in farm management and marketing decisions, and can benefit from certain economies of scale for equipment and infrastructure. Additionally, larger operations tend to have greater impacts upon the local economy through direct employment, as well as impacts upon supporting industries and food processing industries (California Department of Conservation 1997).

The Project Size rating considers both the total acreage of land and the different quality of land that comprise the operation when evaluating agricultural productivity. Lands with higher quality soils lend themselves to greater management and cropping flexibility and have the potential to provide greater economic return per unit acre. Table 2 shows the Project Size Rating Scores the LESA Model assigns projects based on the acreage and LCC rating of soils within the Project site. As shown in Table 2, the Project Size rating divides the Project into three acreage groupings based upon the LCC ratings that were previously determined in the LE analysis. Under the Project Size rating, relatively fewer acres of high quality soils are required to achieve a maximum Project Size score. Alternatively, a maximum score on lesser quality soils could also achieve a maximum Project Size score (California Department of Conservation 1997). As shown in Table 3, the Project is assigned the maximum Project Size score of 100 because the Project site includes over 80 acres of soils with an LCC rating of IIw and IIe.

LCC Class I or II soils		LCC Class III soils		LCC Class IV or lower	
Acres	Score	Acres	Score	Acres	Score
80 or Above	100	160 or Above	100	320 or Above	100
60 to 79	90	120 to 159	90	240 to 319	80
40 to 59	80	80 to 119	80	160 to 239	60
20 to 39	50	60 to 79	70	100 to 159	40
10 to 19	30	40 to 59	60	40 to 99	20
Fewer than 10	0	20 to 39	30	Fewer than 40	0
--	--	10 to 19	10	--	--
--	--	Fewer than 10	0	--	--

LCC = Land Capability Classification

Table 3 Project Size Score			
Soil Type	I	J	K
	LCC Class I–II	LCC Class III	LCC Class IV–VIII
Glenbar Complex	--	2.0	--
Holtville Silty Clay, Wet	0.2	--	--
Indio-Vint Complex	0.1	--	--
Meloland Fine Sand	--	2.0	--
Meloland Very Fine Sandy Loam, Wet	--	18.2	--
Vint And Indio Very Fine Sandy Loams, Wet	51.6	--	--
Vint Loamy Very Fine Sand, Wet	49.9	--	--
Imperial-Glenbar Silty Clay Loams, Wet, 0-2% Slopes	--	23.7	--
Rositas Fine Sand, Wet, 0-2% Slopes	--	15.5	--
Rositas Fine Sand, 0-2% Slopes	--	0.2	--
Total Acres	101.8	61.4	0.0
Project Size Scores	100	70	0
Highest Project Size Score		100	--
NOTE: Totals may vary due to independent rounding. The Project site consists of 0.1 acre of water associated with the Westside Main Canal, which is included in Table 1 and Figure 4 above. However, water does not have an LCC Class, and therefore is not included in Table 3. LCC = Land Capability Classification			

3.2.2 Water Resources Availability Rating

The Water Resource Availability Rating is based upon identifying the various water sources that may supply a given property, and then determining whether different restrictions in supply are likely to take place in years that are characterized as being periods of drought and non-drought (California Department of Conservation 1997).

Although the Project site has been fallow for more than a decade, the Project site could be irrigated entirely by irrigation water provided by the IID. Due to the high reliability of IID to deliver water during drought and non-drought years, and due to the presence of the Westside Main Canal immediately adjacent to the northern Project boundary, the Project has no physical or economic restrictions that could reduce the availability of water resource supply during either drought or non-drought years. Consequently, the Project site is assigned the maximum Water Resources Availability score of 100 (Table 4).

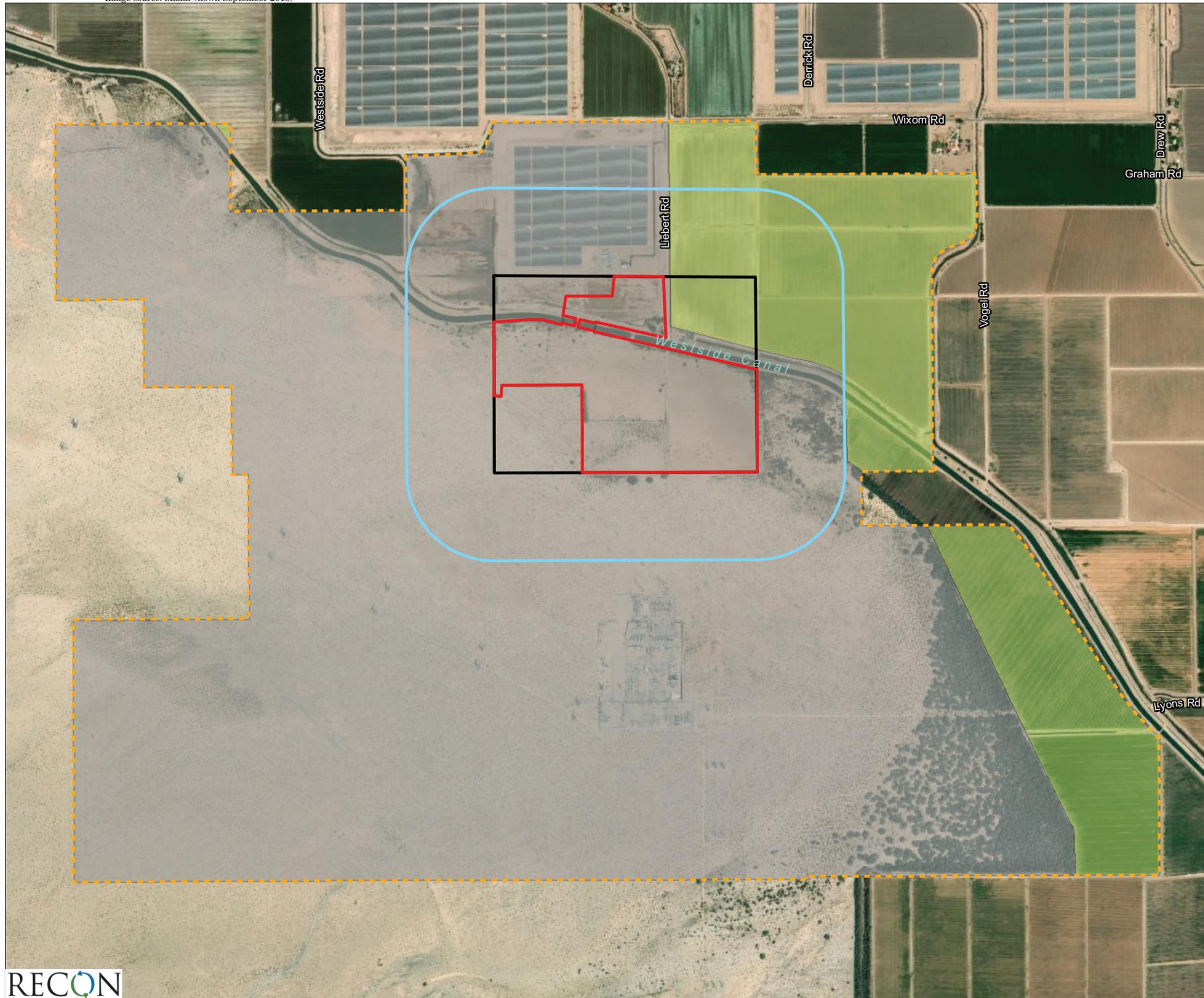
Table 4 Water Resource Availability Score				
A	B	C	D	E
Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Availability Score
1	Imperial Irrigation District Irrigation Water	1.0	100	100
Total Water Resources Score				100

3.2.3 Surrounding Agricultural Land Rating

The Surrounding Agricultural Land Rating provides a measurement of how land near a given project, both directly adjoining and within a defined distance away, may both influence and be influenced by the agricultural land use of the subject project site. The Surrounding Agricultural Land Rating is based on identification of a project site’s “Zone of Influence” (ZOI), which consists of surrounding parcels located within 0.25 mile from the project boundary. Parcels that are intersected by the 0.25-mile buffer are included in their entirety. The project site is assigned a “Surrounding Agricultural Land” score based upon the percentage of agricultural land in the ZOI. The LESA Model rates the potential significance of the conversion of an agricultural parcel that has a large proportion of surrounding land in agricultural production more highly than one that has a relatively small percentage of surrounding land in agricultural production. Table 5 shows the Surrounding Agricultural Land Rating Scores the LESA Model assigns projects based on the percentage of surrounding land in agricultural production within the ZOI (California Department of Conservation 1997).

Percent of Project’s Zone of Influence in Agricultural Use	Surrounding Agricultural Land Score
90 to 100	100
80 to 89	90
75 to 79	80
70 to 74	70
65 to 69	60
60 to 64	50
55 to 59	40
50 to 54	30
45 to 49	20
40 to 44	10
40 <	0

RECON conducted field reconnaissance to identify active farmland within the ZOI. Figure 5 shows that land within the northeastern portion of the ZOI is currently in agricultural production, which constitutes approximately 16 percent of the ZOI. Because land currently in agricultural production constitutes approximately 16 percent of the ZOI, the Project site is assigned a Surrounding Protected Resource Land Rating score of zero.



- Project Boundary
- Envelope
- 0.25-mile Buffer of Envelope
- Zone of Influence - 3,187 ac.
- Non-Farmland - 2,664.2 ac. (84% of Total)
- Active Farmland - 522.8 ac. (16% of Total)



FIGURE 5
Surrounding Agricultural Land

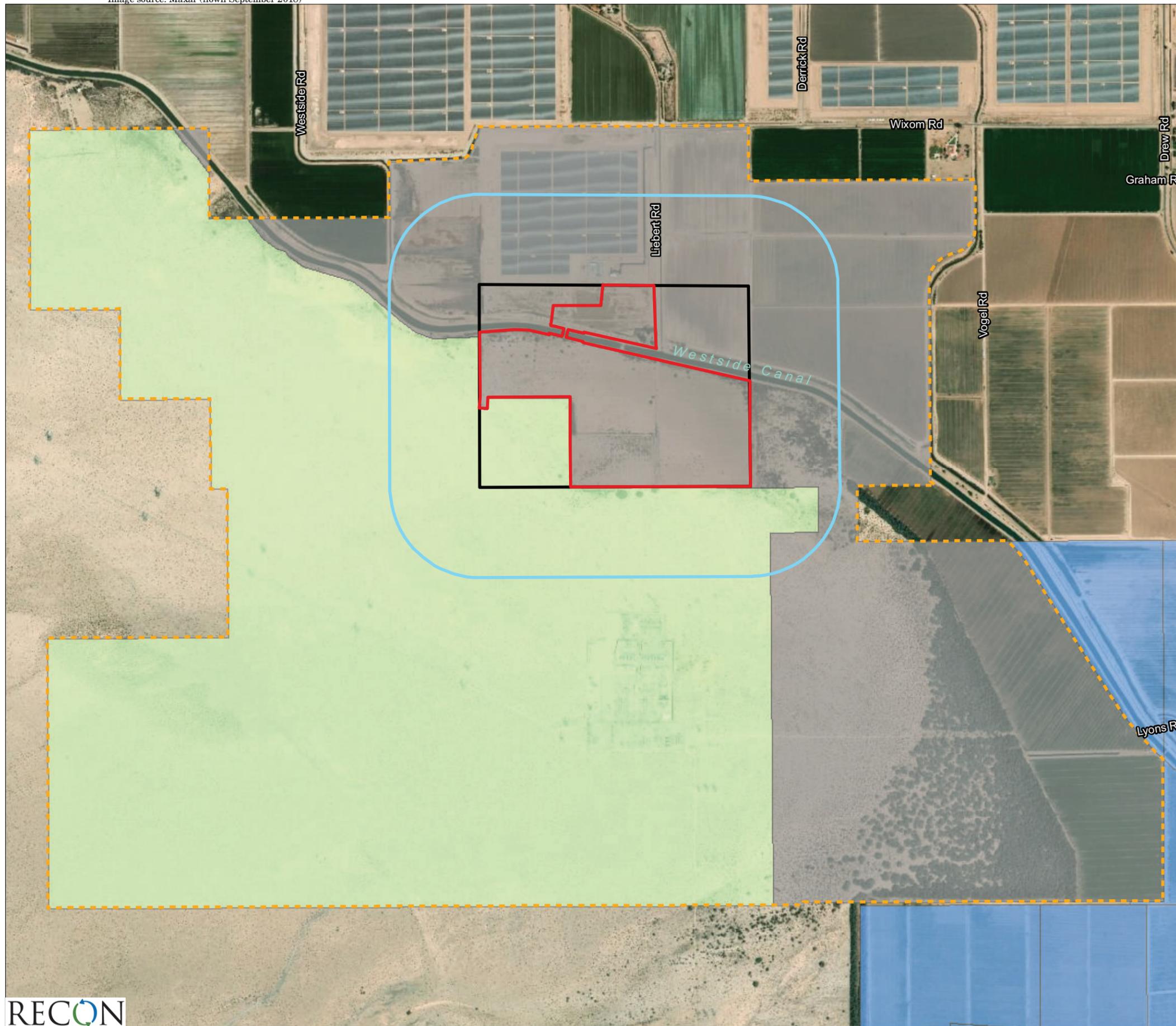
3.2.4 Surrounding Protected Resource Land Rating

The Surrounding Protected Resource Land Rating is essentially an extension of the Surrounding Agricultural Land Rating, and is scored in a similar manner. Protected resource lands are those lands with long-term use restrictions that are compatible with or supportive of agricultural uses of land, including the following:

- Williamson Act contracted land;
- Publicly owned lands maintained as park, forest, or watershed resources; and
- Lands with agricultural, wildlife habitat, open space, or other natural resource easements that restrict the conversion of such land to urban or industrial uses (California Department of Conservation 1997).

Table 6 shows the Surrounding Protected Resource Land Rating Scores the LESA Model assigns projects based on the percentage of protected resource lands within the ZOI. Review of California Department of Conservation, Division of Land Resource Protection, Conservation Program Support mapping data determined that there are no parcels protected by Williamson Act Contracts within the ZOI (California Department of Conservation 2017). Review of the U.S. Department of the Interior, BLM mapping data for Areas of Critical Environmental Concern (ACEC) determined that 1,880 acres of the ZOI are within the Yuha Basin ACEC (U.S. Department of the Interior 2017). This land within the Yuha Basin ACEC constitutes 59 percent of the ZOI. Search of available geographic information systems data did not yield any sources identifying easements that restrict conversion of land to urban or industrial uses. Therefore, 1,307 acres of land within the ZOI are considered unprotected (41 percent of the ZOI). The locations of protected resource land surrounding the Project site is presented in Figure 6. Based on the results of the analysis, the Project site is assigned a Surrounding Protected Resource Land Rating score of 40.

Table 6 Surrounding Protected Resource Land Rating Scores	
Percent of Project's Zone of Influence Defined as Protected	Surrounding Protected Resource Land Score
90 to 100	100
80 to 89	90
75 to 79	80
70 to 74	70
65 to 69	60
60 to 64	50
55 to 59	40
50 to 54	30
45 to 49	20
40 to 44	10
40 <	0



-  Project Boundary
-  Envelope
-  0.25-mile Buffer of Envelope
-  Zone of Influence - 3,187 ac.
-  Unprotected Land - 1,307 ac (41% of Total)
- Protected Resource Land**
-  BLM Yuha Basin ACEC - 1,880 ac (59% of Total)
-  Williamson Act Parcels - 0.0 ac (0% of Total)



FIGURE 6
Surrounded Protected Resource Land

4.0 Summary

The LESA Model is weighted so that 50 percent of the total LESA score is derived from the LE factors, and 50 percent is derived from the SA factors. Table 7 presents the individual scores and factor weighting used to develop the final LESA score. As shown in Table 7, the LE subscore is 27.2, while the SA subscore is 32.0, resulting in a final LESA score of 59.2. As shown in Table 8, a final LESA score between 40 to 59 points is considered significant if both the LE and SA subscores are greater than or equal to 20 points. Because both subscores (LE and SA) are greater than 20, the Project is considered to have a significant impact on agricultural resources.

Table 7 Final Land Evaluation and Site Assessment Score Sheet			
A	B	C	D
Factor Name	Factor Score (0–100 Points)	Factor Weighting (Total = 1.00)	Weighted Factor Score
Land Evaluation			
Land Capability Classification	64.2	0.25	16.1
Storie Index Rating	44.7	0.25	11.2
Land Evaluation Subscore			27.2
Site Assessment			
Project Size	100	0.15	15.0
Water Resource Availability	100	0.15	15.0
Surrounding Agricultural Lands	0	0.15	0
Protected Resource Lands	40	0.05	2.0
Site Assessment Subscore			32.0
Total Land Evaluation and Site Assessment Score			59.2

Table 8 California Land Evaluation and Site Assessment Model Scoring Thresholds	
Total Land Evaluation and Site Assessment Score	Scoring Decision
0 to 39 Points	Not Considered Significant
40 to 59 Points	Considered Significant <u>only</u> if Land Evaluation <u>and</u> Site Assessment subscores are each <u>greater</u> than or equal to 20 points
60 to 79 Points	Considered Significant <u>unless</u> either Land Evaluation <u>or</u> Site Assessment subscore is <u>less</u> than 20 points
80 to 100 Points	Considered Significant

5.0 References Cited

California Department of Conservation

1997 California Agricultural Land Evaluation and Site Assessment Model, Instruction Manual.

2017 Division of Land Resource Protection, Conservation Program Support mapping data.

U.S. Department of Agriculture Natural Resources Conservation Service

2013 SSURGO Imperial County, California, Imperial Valley Area (CA683) Version 2, December 19.

2017 Web Soil Survey. Soil Survey Area: Imperial County, California, Imperial Valley Area.

U.S. Department of the Interior

2017 Bureau of Land Management mapping data for Areas of Critical Environmental Concern. April 27.

APPENDIX C – AGRICULTURAL RESOURCES AND FISCAL IMPACT

C.2. Economic, Employment, and Fiscal Impact Analysis

Development Management Group, Inc.

economic development ■ fiscal & economic analysis ■ development management



CED WESTSIDE CANAL STORAGE, LLC

Imperial County, California

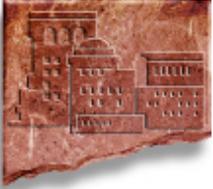
Economic Impact Analysis (EIA)
Employment (Jobs) Impact Analysis (JIA)
Fiscal Impact Analysis (FIA)
Statement of Potential for Urban Decay

Completed for:



Final Report of Findings
December 4, 2020





Development Management Group, Inc.

economic development ■ fiscal & economic analysis ■ development management

December 4, 2020

Jim Minnick, Director of Planning and Development Services
David Black, Planner IV
County of Imperial
801 Main Street
El Centro, CA 92243

RE: FINAL REPORT OF FINDINGS ECONOMIC/EMPLOYMENT (JOBS)/FISCAL IMPACT ANALYSIS AND STATEMENT OF POTENTIAL FOR URBAN DECAY: CED WESTSIDE CANAL BATTERY STORAGE, LLC: IMPERIAL COUNTY, CA

Dear Mr. Minnick and Mr. Black:

On behalf of Development Management Group, Inc., I am honored to provide you with our independent analysis of the economic, employment and fiscal impacts of the proposed CED Westside Canal Battery Storage, LLC project in Imperial County, CA. The purpose of this cover letter is to provide you with a brief explanation of each of the three analyses contained in this report and a summary. By review, the proposed project is a 2,000 MW battery storage facility over approximately 163 acres.

An *Economic Impact Analysis* calculates the predicted impact to a community or region as a result of a project or activity. This includes all known direct (and indirect) expenditures as a result of both construction and operation for the projected life of a facility/project. With respect to the CED Westside Canal Battery Storage, LLC project we have calculated that the economic impact to the Imperial County region will be approximately \$165.13 million over the thirty (30) year life of the project (inclusive of both project construction and operations but exclusive of governmental taxes and fees).

An *Employment or Jobs Impact Analysis* calculates the total amount of construction and operational jobs. Specific to the CED Westside Canal Battery Storage, LLC, we have determined that the proposed project will generate the equivalent of 1,549 full-time one-year equivalent construction jobs over the construction period (five-phases in odd years (1-9)) and 20 full-time equivalent permanent jobs, at buildout.

These are all new economic benefits and jobs as the subject site is reported to have not been actively used for agriculture or any other uses for at least fifteen (15) years.

Finally, a *Fiscal Impact Analysis* calculates the amount of revenue a governmental agency is expected to receive and calculates the projected costs they will incur to provide appropriate services to both the project and the additional population/employment generated as a result of such. A comparative model is then produced in order to determine if the project is of economic benefit or cost to the government agency.

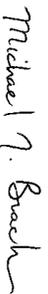
Development Management Group, Inc. has calculated that the CED Westside Canal Battery Storage, LLC will generate approximately \$81.53 million in net local (county) tax revenue over the thirty (30) year life of the project. This is derived from an estimated \$34.77 million in sales tax revenue and \$46.77 in net property tax revenue.

It is projected that it will cost the County about \$22.46 million to provide appropriate services to the project and related employment thus generating a projected surplus to the County of Imperial of about \$59,08 over the thirty (30) year period this report represents (subject to acceptance of the recommendations provided within the report).

Note that this amount is based solely on the tax laws that are currently in place and does not include any amounts that may be received by the County under a Public Benefits Agreement or similar arrangement.

A complete report of findings along with a list of sources and detailed calculations are contained within the report that follows. We are prepared to answer any questions you may have about our work and conclusions. I can be reached at (760) 272-9136 or by email at michael@dmgeconomics.com.

Sincerely,



Michael J. Bracken
Managing Partner

1. Introduction

Development Management Group, Inc. (DMG) has been retained by the County of Imperial to provide an independent Economic Impact Analysis (EIA), Employment/Jobs Impact Analysis (JIA) and Fiscal Impact Analysis (FIA) for a proposed energy battery storage facility to be constructed within the County of Imperial. The project is scheduled to hold a maximum of 2,000 MW of power for a period of one hour. CED Westside Main Battery Storage, LLC is the development company proposing this project. For purposes of this report, the project shall be referred to by its entire name or by ConEd Westside.

This Employment Impact Analysis assumes all calculations in 2020 dollars as a base year with an appropriate adjustment for future years (see notes in exhibits for assumptions). The expected life of the facility is 30 years which is generally in line with the length of entitlements for these types of projects.

2. Contact Information for County of Imperial

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David Black, Planner IV
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3. Contact Information for Development Management Group, Inc.

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Palm Desert, CA 92260
(760) 346-8820
michael@dmgeconomics.com

4. Statement of Contents:

1. Introduction/Purpose
2. Contact Information for the County of Imperial
3. Contact Information for Development Management Group, Inc.
4. Statement of Contents
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6. Scope and References of Analysis
7. Qualifications of Consultant
8. Description of Economic Multipliers
9. Need for Battery Storage for Renewable Energy Generation
10. Host Region and Location of Project
11. Description of Analyses Contained
12. Economic Impact Analysis (EIA)
13. Employment/Jobs Impact Analysis (JIA)
14. Fiscal Impact Analysis (FIA)
15. Statement Regarding Urban Decay
16. Recommendations Regarding Fiscal Impact and Mitigations
17. Certification
18. Exhibit A: Consumer Price Index Calculations 1990-2019
19. Exhibit B: Construction/Operational Economic Impacts
20. Exhibit C: Projected Governmental Revenues
21. Exhibit D: County of Imperial Taxing Organization Benefit Chart
22. Exhibit E: County of Imperial Taxing Organization Benefit Reconciliation
23. Exhibit F: Local Taxing Jurisdiction Tax Allocation Estimates
24. Exhibit G: Projected Employment Impacts Project Site
25. Exhibit H: County of Imperial Budget Calculations
26. Exhibit I: Projected Costs for County of Imperial to Provide Government Services to Project
27. Exhibit J: Consolidated Revenue Versus Expenses to County of Imperial for ConED Westside
Main Battery

5. Statement of Independence

The County of Imperial has provided a joint contractual obligation with Development Management Group, Inc. regarding independence of conclusions contained in this report. Therefore, neither project proponent (applicant) nor the County of Imperial have provided editorial comment or direction regarding the conclusions contained herein.

6. Scope and References of Analysis:

Development Management Group, Inc. hereby discloses that we use information from the following sources in completing this analysis:

1. California Department of Conservation
2. California Department of Industrial Relations
3. California Economic Strategy Panel (RIMS II)
4. California Employment Development Department
5. California Energy Commission
6. California Independent System Operator
7. California Public Utilities Commission
8. California State Board of Equalization
9. California State Department of Finance
10. CED Westside Canal Battery Storage, LLC
11. County of Imperial, California
12. County of Imperial, California
13. County of Kern, California
14. County of Riverside, California
15. County of San Bernardino, California
16. Development Management Group, Inc. (Guidance Memorandum Dated 2/22/12)
17. Environics Analytics
18. Environmental Management Associates
19. Raincross Corporation
20. Regional Analysis & Information Data Sharing (Raidsonline.com)

21. Southern California Edison
22. The Hoyt Report
23. United States Bureau of Economic Analysis
24. United States Census Bureau (American Community Survey)
25. United States Department of Labor

7. Qualifications of Consultant

Development Management Group, Incorporated (DMG, Inc.) specializes in services related to microeconomics and economic development. Such services include site selection and analysis, economic development strategic planning and implementation, development management, market/development feasibility, economic analysis, entitlement/permit processing and project financing. DMG has completed over two hundred (200) Fiscal and Economic Impact Analysis projects for both the private and public sector and serves as a contract economist for the Southern California Association of Governments.

For over fifteen (15) years, DMG, Inc. has assisted over five dozen companies with their site selection and entitlement/permit processing. These companies have created thousands of new construction and permanent jobs and invested tens of millions of dollars within the communities they are located. In addition, DMG, Inc. has assisted several public agencies and economic development corporations with economic impact analysis, strategic planning, marketing and other business recruitment projects creating the administrative and operational infrastructure to enable them to grow their economies.

The company founder, Michael Bracken, brings over 25 years of local, regional, and state government experience in the fields of economic development, redevelopment, housing and sales and use tax administration. Before founding Development Management, Inc., Bracken completed four years as the President and Chief Executive Officer of the Coachella Valley Economic Partnership where he led a regional business recruitment team that generated over \$90 million of economic investment for the Palm Springs Region of Southern California.

Bracken holds a Bachelor's Degree in Business Administration and a Master's Degree in Public Administration from The California State University San Bernardino (CSUSB). He co-designed CSUSB's Master's level course titled *Management of Local Economic Development*, which trains economic development professionals in business recruitment and effective use of financial and tax incentives.

He is also a former City Councilman and Vice-Chairman of a Community Redevelopment Agency providing unique and beneficial prospective to local governments.

8. Description of Economic Multipliers

There are two types of multipliers that are generally utilized by economists. These include spending multipliers and job creation multipliers. Simply stated, spending multipliers is the calculation of the number of times a dollar is expected to be spent through the regional economy. Economic multipliers differ based on the origination of that particular dollar. For example, labor multipliers are higher than material multipliers as labor dollars are paid directly to personnel and generally spent more locally. Dollars spent on materials (for example, construction materials) are more likely to leave the regional economy as they are used to pay suppliers located elsewhere.

Economists often provides the example of a gold mining town when describing the concept of economic multipliers. Imagine a gold miner with money paying various persons within the town for a place to sleep, equipment to mine, food and entertainment. The recipients of these dollars then utilize the money they received for their own purchases (including a place to sleep, supplies for their businesses, food and entertainment). Economic multipliers are the basis of understanding how a particular business or use will impact a regional economy.

There is disagreement between individual economists and government authorities regarding appropriate economic multipliers. More aggressive economists often argue for higher economic multipliers stating that dollars continually circulate through an economy. Conservative economists believe that multipliers are lower, and that the circulation has an ending point (and therefore a new beginning point) in the spending cycle. In an effort to provide the greatest amount of accuracy to an analysis of this nature, Development Management Group, Inc. utilizes the RIMS II model (produced by the United States

Bureau of Economic Analysis) , which most economists consider to be a more conservative estimate of economic multipliers.

The RIMS II model is based on work by the United States Bureau of Economic Analysis. DMG, Inc. is utilizing the latest RIMS II Model (dated 2012/2017). Use is also made of the California Economic Strategy Panel 2009. They published a study titled “Using Multipliers to Measure Economic Impacts”. This publication looks at 473 industry types. In this report, earnings have an economic multiplier of between 1.40 (industries related to social assistance) and 7.59 (industries involving water transportation). Most economic multipliers are in the 2.00 to 2.50 range.

Employment multipliers help predict the number of additional jobs that are created elsewhere in the economy for each job of a certain type. For example, if a certain type of job (let’s say one involving the retail trade which has a multiplier of 1.6312, for each job directly attached to retail, an additional .6312 (or 6/10) of a job is created elsewhere in the economy). DMG, Inc. applies the use of economic multipliers in the following pages to help present potential economic, employment and fiscal impacts.

9. Need for Renewable Energy Generation

As the Renewable Portfolio Standard (RPS) requirements continue to increase, so will investment in the region. California has essentially met the RPS standard of a minimum of 33% (SBX1-2) and is now working toward the implementation of SB350 which increases the RPS standard to 50% by 2030. Most recently (September 2018) California Governor Jerry Brown signed SB 100 into law, which sets the bar for California to generate 100% of energy through renewable sources by the year 2045.

Most forms of renewable energy have limitations for when it is produced. For example, wind energy can only be produced at times when the prevailing wind is sufficient for the wind-turbines to turn. Relative to solar energy, production occurs when the sun is active with photovoltaic panels.

For California to achieve RPS 50 and RPS 100, energy storage will need to occur. This will allow energy to be produced when it is most efficient or possible (again wind and solar), stored and brought to market through transmission and distribution when it is needed. The CED Westside Main Battery Storage, LLC project is meant to provide battery storage for energy production. The proposed project will hold as much as 2,000 MW of power for up to sixty (60) minutes.

10. Host Region, Location and Project Description

The County of Imperial, California (Imperial County) is located in the southeast corner of California. The population of the County is approximately 188,821. The California Employment Development Department (EDD) shows as of August 2020 that the unemployment rate for Imperial County is 22.9% with 69,200 available in the workforce, 53,400 employed and 15,900 currently unemployed.

CED Westside Canal Battery Storage, LLC is proposing to construct a 2,000 MW (phased) energy battery storage facility in the Imperial Valley portion of Southern California. The project would comprise the development of approximately 163 acres of land in areas that are generally described as portions of unincorporated Imperial County South of Interstate 8, North of Interstate 98, West of Drew Road and immediately South of and adjacent to the Westside Canal (generally about 9 miles West-North-West of the City of Calexico).

Figure 1: Location Map



By nature, a battery storage facility provides energy stabilization to residents and businesses. As described previously, wind and solar energy is only generated a limited number of hours per day. Energy demand is ongoing (though does vary by the time of day). A 2,000 MW battery storage facility has the ability to store power needed by up to 650,000 homes (at 325 homes per MW) for a period of sixty (60) minutes. At 3.5 persons per household, which is a general estimate in Southern California, the ConEd Westside Battery project could support a community of 2.3 million people with their energy needs for up to sixty minutes (note that the project developer indicates that the energy storage duration could last from one (1) hour to ten (10) hours). The facility is scheduled to be built over a period of about nine (9) years as demand for battery storage dictates growth. Note that while the project developer is seeking an entitlement to construct a maximum of 2,000 MW that the phasing only schedules out the first 1,500 MW (which is what DMG, Inc. has analyzed). If the entire project is eventually constructed, the economic, job and fiscal impacts will be different than what this analysis contains.

The subject parcel numbers are provided below:

051-350-009	051-350-018
051-350-010	051=350-019
051-350-011	

Total Acreage: 163 (approximate)

Figure 2: Simulated Rendering of ConEd Westside Battery looking NW from Drew Rd. & Lyons



11. Description of Analyses Contained and Limitations

Development Management Group, Inc. is presenting three types of analysis. These include an Economic Impact Analysis, an Employment or Jobs Impact Analysis and a Fiscal Impact Analysis. Each serves a distinct purpose in evaluating the overall community economics of a project.

An *Economic Impact Analysis* is designed to provide calculations regarding the potential overall economic impact of a project for a region. It gives an understanding of the quantity of dollars that will flow through an economy as a result of a project. In the case of an energy battery storage project this includes such items as labor, construction materials, local purchases and operations. Additionally, calculations are presented regarding the amount of money that will be generated for governmental purposes (through taxes and fees). A combination of the two calculations (and associated multipliers) provides a full understanding of the potential economic impact.

An Employment Impact Analysis (or in this case what we term as a *Jobs Impact Analysis*) provides calculations regarding the number of direct and indirect jobs that are generated as a result of construction and operation of the project. Additionally, it provides a comparison to the direct and indirect jobs that are currently in place if the subject land is in use.

Finally, a *Fiscal Impact Analysis* provides a financial picture of what it may cost a governmental authority (such as the County of Imperial) to provide essential goods and services to a community as a result of a specific development project and compares it to the revenue stream that is expected as a result of the same project. The consolidation of the two calculations provides a graphical analysis for which to determine if a project is fiscally viable for a governmental agency.

This report does have certain limitations, which are disclosed below:

1. CED Westside Canal Battery Storage, LLC has stated that their intention is to seek entitlements to build a maximum of 2,000 MW of battery storage. They have scheduled (for phasing/projection purposes) the first 1,500 MW over a nine-year timeframe (the balance would be constructed if there is sufficient market demand):

- a. Year 1: 100 MW
 - b. Year 3: 200 MW
 - c. Year 5: 300 MW
 - d. Year 7: 400 MW
 - e. Year 9: 500 MW
2. The applicant states they are seeking a forty (40) year Conditional Use Permit. DMG, Inc. has completed an Economic/Job/Fiscal Impact Analysis covering the first thirty (30) years of the proposed project's life. Our work is limited to thirty (30) years so that the figures presented are more useful to the County of Imperial in assessing impacts for budgeting purposes. This also recognizes that tax law and allocations are subject to change, based on State Law.
 3. DMG, Inc. does not provide an analysis of a highest and best use of the subject property. Our analysis is limited to analyzing the proposed/projected use.
 4. DMG, Inc. does not provide civil engineering services or construction cost estimation. We rely on information presented to us from the project developer, though we do compare said information to other similar projects we have analyzed (when applicable).
 5. DMG, Inc. endeavors to utilize as much third-party data as possible, but as with any projection, certain assumptions must be made for which to provide appropriate calculations and conclusions.
 6. DMG, Inc. recognizes that some of the data provided directly by the project proponent is considered proprietary in nature. This said, it is not completely possible to protect all such information in relation to completing this analysis without utilizing some of the specific numbers and calculations.
 7. DMG, Inc. has copyrighted each and every page of this report. The purpose of the Copyright is to protect our analysis and report structure as it is considered intellectual property of DMG, Inc. This said, the County of Imperial does have unlimited use of this report (in Final Report status) for analysis of the project and to submit to the County of Imperial and/or other governmental or permitting authorities which may print/publish for public comment and make public policy decisions, so long as it is not reverse engineered for use to analyze other project(s). Any use by any other person or entity of this analysis and/or system without the express written and/or licensed permission of Development Management Group, Inc. is prohibited.

12. Economic Impact Analysis (Exhibits A thru F)

Construction and Operation

CED Westside Canal Battery Storage's battery storage project is anticipated to cost approximately \$1.8 billion (this includes the construction of 1,500 MW of energy storage capacity for a period of sixty (60) minutes. If the entire 2,000 MW were to be constructed (over the same timeframe) the capital expenditures would total in excess of \$2.43 billion. The costs are generally split into short term (construction) and long term (operational) impacts.

The construction phase of the project is scheduled to include the following types of expenditures:

1. Site Acquisition
2. Engineering
3. Project Management (including Overhead and Profit to an EPC)
4. Battery Storage Facility (including the equipment and labor)
5. Site Work (clearing & grubbing, grading and fencing)
6. Project Substation (for which to "collect" the energy and prepare it for transmission)
7. Interconnection Facilities (to take the power and "load" it onto power transmission lines)
8. Interior Roads & Landscaping
9. Operations Facilities

In terms of construction, the project is expected to generate about 1,550 full-time equivalent jobs lasting about one (1) year. In total, about \$194.2 million is projected in on-site labor construction labor costs (this is exclusive of engineering, overhead, management and other professional hours scheduled through the EPC (EPC is an industry term meaning Engineering, Procurement & Construction)). The economic multiplier for construction labor is 1.1331. This means that for each dollar spent on labor to construct the facility it is anticipated that an additional 13.3 cents are spent within the economy as that dollar circulates. In total, it is projected that the economic impact of construction labor will be about \$220.05 million.

Additionally, \$1.61 billion in material purchases are anticipated to construct the energy storage (battery) project and support facilities. DMG, Inc. projects only a small portion of the material purchases will come from within the region. Such material may include aggregate, concrete, fencing, landscaping and similar items that would be available at a more cost-efficient basis locally.

Thus, for purposes of calculating the potential impact of the development of the project, we are estimating that 5% of the overall materials purchased may come from within the region. This would equate to about \$80.3 million dollars being spent within the region on materials during the construction period. In applying an economic multiplier of 1.1517 for construction material purchases, the overall economic impact of material purchases within the region is anticipated to be about \$92.47 million over the same period.

Long term operational impacts will take the form of operational labor, facility security and maintenance. Information from the developer suggests some additional local material purchases to be made as part of the operation of the facility. It is estimated that the local/regional economic impact of material purchases (during the thirty (30) year life) of the facility will have an economic impact of about \$30.6 million on the regional economy.

The project is scheduled to be built over five (5) phases. The first phase (100MW) will result in four (4) full-time operation jobs. Build-out (1,500 MW) will generate about 20 full-time jobs. Overall, the project has about 1 full-time operation job per 75MW of power produced. The projected full-time wages are significantly above median wages in the region. In year one, fully burdened salaries (inclusive of salary and benefits) exceed \$110,000 annually.

Finally, revenue from the sale of land has recirculate into the economy. At an approximate cost of \$1.18 million (DMG, Inc. research estimates), the economic impact of the land sale itself is \$1.33 million (note the land was previously purchased and DMG, Inc. is simply reflecting the economic impact of the transaction to the overall economy).

It is calculated that the construction and operation of CED Westside Canal Battery Storage project will have an overall economic impact to the County of Imperial of about \$165.13 million over a twenty (30) year period inclusive of construction and operation, but not including governmental revenues (taxes and fees).

Conclusion Regarding Economic Impact to the County of Imperial

Development Management Group, Inc. projects that the CED Westside Canal Battery Storage project will have approximately *\$165.13 million in economic impact to the regional economy* over a thirty (30) year period not including governmental revenues (taxes and fees).

Governmental Revenues

The CED Westside Canal Battery Storage will provide certain and specific tax revenues to the County of Imperial and other region-based taxing organizations. By way of background, while California Law provides a property tax exemption for qualified solar energy systems, there is no such language exemption that applies to energy battery storage projects. For reference, the solar exemption is found in Section 73 of the California Revenue and Taxation Code.

As stated previously, the proposed project will be built in phases. The build-out is scheduled to occur in Year 9 or Year 10. At that point, (Year 9) the project will generate about \$12.56 million in base level (1%) property taxes. That said, the equipment is believed to be on a depreciation schedule that will reduce its value (and therefore property) taxes on an annual basis. There is little information available regarding what an acceptable depreciation schedule will be as there are no other known battery storage facilities of this type/size in Southern California. DMG, Inc. has completed similar analysis for other battery storage projects and what we have used as a depreciation schedule for property tax purposes is what other project developers have stated they are using. That said, it is likely that this will be an item of discussion and potentially contention between various counties and project developers/owners and in no way is the presented depreciation schedule meant presented by or agreed to by either party. If the project developer and County of Imperial agreed to a specific depreciation schedule that is different from the one presented and used in Exhibit C, DMG, Inc. reserves the right to modify this report.

Depreciation Schedule (Year Refers to when Equipment Placed into Service)*

Year 1: 95%	Year 6: 45%
Year 2: 85%	Year 7: 35%
Year 3: 75%	Year 8: 25%
Year 4: 65%	Year 9 (and After): 20%
Year 5: 55%	

*Note the Depreciation Schedule presented and utilized has NOT been reviewed nor approved by the County of Imperial. The actual depreciation is within the purview of the County of Imperial and the State of California.

Overall, it is estimated that the ConEd Westside Battery project will generate some \$169.8 million in base level (1%) property taxes in the thirty (30) years of scheduled operation. Exhibit C provides the estimated tax revenue (inclusive of Sales & Use Tax and Property Tax) to the County of Imperial. Exhibit D is a breakdown of property tax revenues to the County of Imperial while Exhibit E provides a consolidated list of property tax revenue by taxing entities across Imperial County. The County of Imperial itself is expected to receive about \$46.8 million between General Fund (net of ERAF), County Library and County Fire dedicated property taxes. In total, tax benefitting entities across Imperial County will share \$193.75 million of property tax revenues over the first thirty (30) of the project. This is inclusive of various voter-approved taxing initiatives benefitting the Imperial Community College District and Imperial Unified School District.

The second revenue stream comes from Sales Taxes. In the State of California sales tax is applicable when construction materials are purchased by a construction contractor. An example would be a contractor that purchases roofing materials from a roofing supply company. At the time the contractor purchases the materials, he or she pays sales tax on the amount purchased. The point of sale is the place where the purchase was “principally negotiated” which is typically the location of the roofing supply business. The point of sale is important because local jurisdictions receive a portion of the sales tax collected.

In the case of an energy battery storage facility that is scheduled to have \$1.605 billion in materials purchases during the total construction period (Years 1-9), Sales & Use Tax revenue is significant. The point of sale provides substantial financial benefit to the jurisdiction for which the retailer (supplier) of the materials is located. It is noted that the State of California offers an exemption on the State of California portion of Sales & Use Tax applicable to materials used for battery storage. That said, the local share is still applicable.

The following paragraphs provide guidance regarding the applicability of sales tax on construction equipment and the appropriate structure so that the County of Imperial may maximize its ability to receive financial benefit as the designated point of sale:

There are two (2) documents which are worthy of review and understanding relative to how sales and use tax can and should be handled for the project in Imperial County. The first is Regulation 1521, which governs Construction Contractors and defines Construction Contracts. The second is Publication 28 entitled “Tax Information for City and County Officials” (relative to Sales and Use Tax). Both documents are available through the California State Board of Equalization.

Under Regulation 1521, materials utilized for the construction of the facility are subject to Sales & Use Tax. Further, CED Westside Canal Battery Storage or anyone else that would be installing them on real property would be a Construction Contractor and the “retailer” of the product. This means that CED Westside Canal Battery Storage or their Construction Contractor would be responsible for reporting and paying of sales and use tax to the State of California. A section under Regulation 1521 deals directly with Construction Contractors that are also the manufacturer of the product. Simply stated, there are various methods for which CED Westside Canal Battery Storage to determine the retail price or value of the product. Such methods are described in detail on Page 3 of Regulation 1521 (Measure of Tax: Determining Cost Price).

Sales and Use Tax applies to fixtures utilized in the construction process. The law provides the option for a Construction Contractor to obtain a “Sales Tax Jobsite Sub-Permit” that allows the reporting of sales and use taxes at the jobsite itself (rather than where the fixtures were purchased). Essentially this means that the County of Imperial (under the Jobsite Sub-Permit) would receive the maximum financial benefit of a project such as the one proposed by CED Westside Canal Battery Storage. Publication 28

Exhibits A and B provide greater detail as to both the qualification and application to obtain a “Jobsite Sub-Permit”.

Essentially, at such time as construction commences, CED Westside Canal Battery Storage would simply file for a “Sales Tax Jobsite Sub-Permit for Construction Contractors (Exhibit A of Publication 28). Sales Tax will then be reported to the Board of Equalization and paid by CED Westside Canal Battery Storage. Since the Sub-Permit will be specific to the job site, the County of Imperial will receive the maximum amount of sales tax as the local entity.

Sales and Use Tax Designated for the County of Imperial:

In total, the County of Imperial would receive a total of 2.33% of the cost or value of tangible personal property sold within the County. This is comprised of the 1% “Bradley-Burns Uniform Local Tax” base amount, .50% Public Health Allocation (from the State), .50% Public Safety Allocation* and .33% Transportation Tax (the actual tax is .50%, though only .33% of the .50% goes to the County of Imperial specifically, the balance is used regionally and may benefit other municipalities within the region.

*Note: there is uncertainty as to whether the State of California will provide the .50% for Public Health Allocation under this formula. This figure is within the State allocation that the State has chosen to forego for these types of projects.

In terms of application to the CED Westside Canal Battery Storage, if the County of Imperial were to require as part of the Conditions of Approval (or similar project governing document) that the site location be designated as the “Point of Sale” and the County of Imperial will be the beneficiary of \$34.8 million in sales tax over the construction period (Years 1-9).

It is projected that the County of Imperial will garner approximately \$204.53 million in *gross* revenues (sales and property taxes) over the life of the project (Years 1-30). The accepted multiplier for dollars generated (and spent) by local governments is 1.3918 which mean that the overall economic impact of the tax revenue received by the County of Imperial is approximately \$284.66 million over the twenty (30) year life of the project.

****Note:** The Imperial Irrigation District (incumbent provider of electricity) will likely receive about \$1,000,000 per year (at build-out) in revenue to transmit energy on the Campo Verde IV Generation Tie-in Line. As this amount is a) subject to negotiation and b) not revenue received by the County of Imperial itself, it is not scheduled in the predictive analysis.

13. Projected Employment Impacts (Exhibit G)

The next model (Exhibit G) contemplates the payroll and labor (employment) impacts of the proposed use of the subject site for energy battery storage. During construction phases, the project will generate 1,549 full-time equivalent (FTE) jobs. This is based on approximately 3.22 million craft hours of work (the FTE is simply dividing the total craft hours by 2,080, the average amount of hours in a year for a full-time worker). Each construction job carries a jobs multiplier of 1.1859, meaning for each full-time equivalent job created for the construction of the facility another 2/10ths of a job is created elsewhere in the economy. Further for each \$1 spent toward construction labor, an additional 13.3 cents are generated elsewhere in the economy (based on a 1.1331 labor multiplier). Overall, this means that the construction of the facility will create a total of 1,837 direct and indirect jobs lasting one year (FTE) and produce about \$258.48 million in total economic impact from construction labor.

At build-out, the facility will have twenty (20) permanent on-site full-time employees engaged in a variety of professional and maintenance level tasks. Additionally, the facility may host outside vendors and equipment manufacturers completing various testing and compliance work. Overall, the operation staff will have wages in 2020 dollars that significantly exceed the median wages in Imperial County with positions starting between \$75,000 and \$100,000 per year (plus benefits) (note that the Median Household Income for Imperial County is estimated at \$45,834 per the American Community Survey (2018)). Utility jobs have one of the highest job multipliers, it is estimated that the one (1) direct job will generate an additional .45 of a job (1/2 a job) will be generated elsewhere in the economy.

Figure 3

Employment Impacts from Proposed CED Westside Canal Battery Storage, LLC Project

<i>Item</i>	<i>Battery Storage w/o Construction</i>	<i>Battery Storage w/Construction</i>
Construction FTE*	0	1,549
Projected Direct Jobs (at Buildout)*	20	1,569
Projected Total Jobs **	29	1,866
Projected 20-Year Employment Impact	\$98,250,378	\$318,298,398

*Construction FTE is total one-year equivalent

**Projected total jobs include both direct and indirect jobs based on RIMS II Modeling

14. Fiscal Impact to the County of Imperial, California (as a Municipal Corporation) Exhibits

H-J

A Fiscal Impact Analysis was completed to determine if the revenues scheduled were sufficient for which to allow the County of Imperial to provide essential goods and services to the project site and the additional population within the City as a result of the construction and/or operation of the energy battery storage facility. It is estimated that the County will receive a net of approximately \$81.53 million in tax revenues over the first thirty (30) years of the project (\$46.77 million in property tax revenue and \$34.77 million in sales tax). This figure is a base figure for which to better understand the aggregate fiscal impacts of the proposed CED Westside Canal Battery Storage project on the County.

There are multiple ways of conducting a Fiscal Impact Analysis. DMG, Inc. has chosen to utilize the following assumptions/methodology:

1. Land in and of itself has little call for service from the County of Imperial.
2. Persons employed (to construct, operate or secure) at the facility do require various general governmental services.
3. For purposes of evaluating the potential demand by persons for services, it is assumed that each full-time equivalent job (construction, operation or security) shall support an average citywide household size of 3.87 persons (meaning the employee and an additional 2.87 persons).

4. There is insufficient data to determine the level of specific police and fire services that may be required to service the site, based on its proposed use. Previous communication with various counties in Southern California by Development Management Group, Inc. (Imperial, Riverside, San Bernardino and Kern) reveal that there is not enough data from those regions for which to predict the level of service a County or City provides in terms of public safety call volume for which to calculate a direct costs. DMG, Inc. therefore utilizes a person-household based cost model.

To generate a Fiscal Impact Analysis, a schedule of costs for County of Imperial General Government Services (General Fund) was generated as Exhibit H. This was extrapolated from County of Imperial budget documents. Exhibit H shows approximately \$433.49 million for General Government expenditures by the County of Imperial in Fiscal Year 2019-2020 (this is budgeted amount and not actual spend and does not account for revenue declines because of Covid-19). This equates to approximately \$2,295.75 per person (based on a population of 188,821).

Revenue for counties come from a variety of tax sources including Sales & Use Tax, Transient Occupancy Taxes (also known as Hotel Taxes), Property Tax and revenues provided by the State and Federal Government. Revenues from State and Federal sources are not considered protected and therefore cities must always be able to potentially fund services to their residents without the benefit of these funds.

Development Management Group, Inc. recognizes that the revenue climate (at the State and Federal level) is ever changing and in order to provide a conservative analysis, it is expected that new projects into the County provide sufficient revenue for which to support 100% of the costs (without expectation of additional reimbursement from State or Federal sources). Also, local government budgets for FY 20-21 are considered constrained due to economic losses associated with Covid-19. Therefore, the FY 19-20 Budget for the County of Imperial is utilized to determine service costs to residents.

Utilizing project level data, we have generated a schedule that calculates the estimated costs to provide General Government services because of the proposed project. For example, in Year 1, it is estimated that there will be 205.04 full-time equivalent construction workers and four (4) full-time operational employees.

Overall, in Year 1 (construction and operations), DMG, Inc. calculates that the CED Westside Canal Battery Storage project will need to support a total population of 808.98. At a cost of \$2,296 per person, it will cost the City about \$1,857,227. In Year 2, where there is only operational staff (of four persons), the total population to be supported is 3.87 at a per capita cost of \$2,352 for a total cost of \$36,408. Over the first thirty (30) years of operation, it is estimated that hosting the CED Westside Canal Battery Storage Project will cost the County of Imperial \$22.46 million.

Exhibit J provides a comparison on a year by year basis of the anticipated revenues to the County of Imperial as a result of the project and compares it to the anticipated expense to provide General Government Services to the employees and their families/dependents. The exhibit accounts for the approximately 2.33% of sales tax that is anticipated to be received along with an allocation of (approximately) 27.55% of the overall property taxes paid being available to provide General Government Services. In total, the County of Imperial will receive \$81.53 million in total tax revenue because of the CED Westside Canal Battery Storage project.

Analysis of Exhibit J also shows that the CED Westside Canal Battery Storage will produce substantially more money in tax revenue than it will cost the County of Imperial to host the project. In fact, over the first thirty (30), the County of Imperial will receive \$59.08 million more in revenue than it will spend to host the facility.

15. Statement Regarding Urban Decay (as a Result of CED Westside Canal Battery Storage Energy Center)

The State CEQA Guidelines discuss and define the parameters for which the consideration of socioeconomic impacts should be included in an environmental evaluation. State CEQA Guidelines Section 15131 states that “economic or social information may be included in an EIR or may be presented in whatever form the agency desires.” Section 15131(a) of the Guidelines states that “economic or social effects of a project shall not be treated as significant effects on the environment.” An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus on the analysis shall be on

the physical changes.” State CEQA Guidelines Section 15131(b) also state that “economic or social effects of a project may be used to determine the significance of physical changes caused by the project.” One example that has been used by others has been the physical division of a community if rail lines were installed thereby bisecting the community. It is possible that the impacts upon the community could be measured.

In recent years, California Courts have generally defined the term “urban decay” to mean the physical changes that a projects potential socioeconomic impacts could bring to other parts in a community. The case that brought the concept of urban decay to light is Bakersfield Citizens for Local Control v. City of Bakersfield (204) 124 Cal.App.4th 1184 in which the court set aside two EIR’s for proposed Wal-Mart projects that would have been located less than five (5) miles from each other. This appears to be the first time the courts used the words “urban decay” rather than “blight”. In essence, the courts ruled that the two (2) Wal-Mart projects could result in a chain reaction of store-closures and vacancies as a result of new retail growth that may or may not be supported by other changes in market conditions (i.e., the downtowns would become ghost towns because the Wal-Mart(s) moved the retail business away from the urban center).

Based on this case and work that DMG, Inc. (and others) have completed relative to “Urban Decay Analysis”), it appears that the core question to ask (and answer) is the following:

Would the construction of the CED Westside Canal Battery Storage Project at the proposed site result in substantial and adverse physical changes to surrounding areas (i.e., will the project cause such a shift in the marketplace that other portions of the community become visually blighted “urban decay”)?

The surrounding area contains a combination of solar energy generation projects and agriculture uses (as well as agriculture infrastructure). The proposed project is in keeping with the users in that corridor and in and of itself will not create a physical change to the physical characteristics of that area. In fact, the proposed project would add significant value to the solar generation in that area as it would create needed storage capacity for energy to be placed onto the grid at peak demand times.

Would the construction of the CED Westside Canal Battery Storage energy battery storage project at the subject site serve as growth-inducing causing a significant addition of other development or population?

As the State of California is working to conform with its own laws to provide at least 50% of energy to businesses and residents from renewable sources (and 100% in the future), the State must either construct or allow others to construct energy storage facilities as the leading generators of renewable energy (solar and wind) are not able to generate twenty-four (24) hours a day.

The development and operation of the subject facility will create energy stability in times of production shortages and outages and provide energy at times of peak demand (such as early evening hours). The facility is meant to provide this product/service to existing users and is based on overall energy product by other sources. Essentially the energy battery storage facility is part and parcel to energy infrastructure to support existing production facilities. Therefore, this facility will not serve as growth inducing.

We have further determined that the development of the CED Westside Canal Battery Storage ***WILL NOT*** cause physical blight (urban decay) or serve as growth-inducing because the facility exists to support current renewable energy facilities to provide power supply stability.

15. Recommendations Regarding Fiscal Impacts and Mitigation(s)

Development Management Group, Inc. serves as an economist for the County of Imperial. In this capacity, we have been assigned the task of completing a full Economic/Job/Fiscal Impact Analysis as well as general recommendations regarding how the County can best maximize economic benefits and/or minimize fiscal harm to the County of Imperial as a Municipal Corporation and its residents.

A. Development Management Group, Inc. recommends that the County of Imperial consider entering into a formal agreement that requires the project developer to provide certified (and independently audited) payroll records at the conclusion of the project to insure that craft hour estimates (provided by the developer) are accurate and to the extent that the actual craft hours exceeds the estimated craft hours that the County of Imperial is reimbursed for the cost of services needed to support the

construction of the facility. If this is a mitigation measure that the County determines is viable, DMG, Inc. will assist the County in drafting the specific condition of approval appropriate to address this recommendation.

- B. Development Management Group, Inc. recommends that the County of Imperial requires the applicant to have a qualified civil or traffic engineer calculate a) the average life of regional and surface streets from Interstate 8 and/or State Route 98 to the project site(s) b) the potential accelerated impact of street resurfacing based on the construction traffic (equipment and employees) over the first five (5) years of the project c) cost to resurface said streets d) calculate the proportional share for which CED Westside Canal Battery Storage, LLC should be responsible for as part of a direct mitigation payment to the County of Imperial prior to commencing construction. This recommendation is in the event that project construction will utilize surface streets outside of Interstate 8 and/or State Route 98.
- C. Development Management Group, Inc. recommends that the County of Imperial require CED Westside Canal Battery Storage, LLC to enter into a specific cost reimbursement agreement for direct police and fire protection services whereas for each call made to the project site for such public safety services that the project is responsible for reimbursing the County of Imperial. Such agreement can be created using a “Contract Cities Service Rate” for both police (Sheriff) and fire protection services.
- D. Development Management Group, Inc. recommends that the County of Imperial require CED Westside Canal Battery Storage, LLC to enter into a specific cost reimbursement agreement for direct judicial and prosecutory services whereas if a person(s) are tried in a court of law for potential crimes at the project site, that the project itself is required to reimburse the County for such costs.
- E. Development Management Group, Inc. recommends that the County of Imperial require CED Westside Canal Battery Storage, LLC or any other landowner associated with the project sites (parcels) to enter into an agreement(s) whereas the assessed land values shall increase by 2% per annum and improvements and their depreciation schedule (not exempt under Section 73 of the State of California Revenue and Taxation Code) be set by mutual agreement prior to project approval. Such agreement should contain a provision which prohibits said property owner(s) from appealing

their assessed value for the duration of the project operation (or 30 years) whichever comes first. Agreement shall be in full compliance with Proposition 13 in all other aspects.

- F. Development Management Group, Inc. recommends that the County of Imperial require the project developer through Conditions of Approval, Development Agreement or similar document to designate the project site as the “Point of Sale/Point of Use” in compliance with State Board of Equalization Regulation 1521 and file for a “Sales Tax Jobsite Sub-Permit for Construction Contractors” as outlined in State Board of Equalization Publication 28, Exhibit A.

- G. Development Management Group, Inc. recommends that the County of Imperial enter into some type of agreement with the project proponent that recognizes the taxable material cost estimates contained in Exhibit A of this report and provides a formal guarantee (bond or otherwise) in order to provide greater certainty of these figures.

- H. Development Management Group, Inc. recommends that the County of Imperial condition the project so that if battery storage or ancillary equipment is replaced with new equipment after the original construction period (most likely for purposes of utilizing newer technology) that the project site again designated as the "Point of Sale/Point of Use" as to create an additional local tax funding source for the County of Imperial. This requirement is similar to Item F but extends said condition in such cases as a substantial portion of the equipment is "upgraded", "replaced" or “repowered”.

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17. Certification

I certify that my engagement to prepare this report was not contingent upon developing or reporting predetermined results. The statements of fact contained herein and the substance of this report are based on public records, data provided by the CED Westside Canal Battery Storage, LLC and other sources as described in the reference section of this report. This report reflects my personal, unbiased professional analyses, opinions and conclusions. If any of the underlying assumptions related to this report change after the date of this report (December 4, 2020), then the undersigned reserves the professional privilege to modify the contents and/or conclusions of this report.



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Exhibit A			
Consumer Price Index Calculation (30-Years) 1990-2019			
	#	Year	CPI %
	1	1990	5.4
	2	1991	4.2
	3	1992	3
	4	1993	3
	5	1994	2.6
	6	1995	2.8
	7	1996	3
	8	1997	2.3
	9	1998	1.6
	10	1999	2.2
	11	2000	3.4
	12	2001	2.8
	13	2002	1.6
	14	2003	2.3
	15	2004	2.7
	16	2005	3.4
	17	2006	3.2
	18	2007	2.8
	19	2008	3.8
	20	2009	-0.4
	21	2010	1.6
	22	2011	3.2
	23	2012	2.1
	24	2013	1.5
	25	2014	1.6
	26	2015	0.1
	27	2016	1.3
	28	2017	2.1
	29	2018	1.9
	30	2019	2.3
	Gross		73.4
	Average		2.4467
Average Increase in Consumer Prices = 2.4467% annually			

Exhibit B

**Construction/Operational Economic Impacts: (Years 1-30)
CED Westside Canal Battery Storage, LLC Imperial County, CA**

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Short Term Economic Impacts										
Phase Size (MW)*	100		200		300		400		500	
On-Site Construction Labor	\$22,800,000		\$24,100,000		\$37,025,000		\$49,100,000		\$61,175,000	
Economic Multiplier Rate	1.1331		1.1331		1.1331		1.1331		1.1331	
Economic Impact of Labor	\$25,834,680		\$27,307,710		\$41,953,028		\$55,635,210		\$69,317,393	
Construction Materials	\$125,200,000		\$208,900,000		\$319,475,000		\$423,900,000		\$528,325,000	
Local Purchase Materials (%)	0.05		0.05		0.05		0.05		0.05	
Projected Purchase of Materials Locally	\$6,260,000		\$10,445,000		\$15,973,750		\$21,195,000		\$26,416,250	
Economic Multiplier Rate	1.1517		1.1517		1.1517		1.1517		1.1517	
Local Impact	\$7,209,642		\$12,029,507		\$18,396,968		\$24,410,282		\$30,423,595	
Land Purchase	\$1,184,000									
Economic Multiplier Rate	1.1239									
Local Impact	\$1,330,698									
Long Term Economic Impacts										
Operational Materials (Ongoing)	\$534,700	\$547,783	\$1,683,555	\$1,724,747	\$3,533,892	\$3,620,356	\$6,181,559	\$6,332,803	\$9,731,622	\$9,969,726
Local Material Purchase (10%)	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
Projected Local Purchases of Materials	\$53,470	\$54,778	\$168,356	\$172,475	\$353,389	\$362,036	\$618,156	\$633,280	\$973,162	\$996,973
Economic Multiplier Rate	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517
Local Impact of Material Purchases	\$61,581	\$63,088	\$64,632	\$66,213	\$67,833	\$69,493	\$71,193	\$72,935	\$74,719	\$76,548
Operational Labor	\$461,500	\$472,792	\$1,609,983	\$1,649,375	\$1,303,097	\$1,334,980	\$1,953,775	\$2,001,578	\$2,547,415	\$2,609,742
Economic Multiplier Rate	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944
Economic Impact of Labor (Annually)	\$551,216	\$564,702	\$1,922,964	\$1,970,014	\$1,556,419	\$1,594,500	\$2,333,589	\$2,390,685	\$3,042,632	\$3,117,076
Aggregate of Impacts (Annual)	\$34,987,817	\$627,790	\$1,987,595	\$2,036,227	\$1,624,252	\$1,663,993	\$2,404,782	\$2,463,620	\$3,117,352	\$3,193,623
Cumulative of Impacts (Cumulative)	\$34,987,817	\$35,615,607	\$37,603,202	\$39,639,429	\$41,263,681	\$42,927,674	\$45,332,456	\$47,796,076	\$50,913,428	\$54,107,051
	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20
Long Term Economic Impacts										
Operational Materials (Ongoing)	\$10,213,655	\$10,463,553	\$10,719,565	\$10,981,840	\$11,250,533	\$11,525,800	\$11,807,801	\$12,096,703	\$12,392,673	\$12,695,884
Local Material Purchase (10%)	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
Projected Local Purchases of Materials	\$1,021,366	\$1,046,355	\$1,071,956	\$1,098,184	\$1,125,053	\$1,152,580	\$1,180,780	\$1,209,670	\$1,239,267	\$1,269,588
Economic Multiplier Rate	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517
Local Impact of Material Purchases	\$1,176,307	\$1,205,087	\$1,234,572	\$1,264,779	\$1,295,724	\$1,327,426	\$1,359,904	\$1,393,177	\$1,427,264	\$1,462,185
Operational Labor	\$2,673,595	\$2,739,009	\$2,806,025	\$2,874,680	\$2,945,015	\$3,017,070	\$3,090,889	\$3,166,514	\$3,243,989	\$3,323,359
Economic Multiplier Rate	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944
Economic Impact of Labor (Annually)	\$3,193,341	\$3,271,473	\$3,351,516	\$3,433,517	\$3,517,525	\$3,603,589	\$3,691,758	\$3,782,084	\$3,874,620	\$3,969,420
Aggregate of Impacts (Annual)	\$4,369,648	\$4,476,560	\$4,586,088	\$4,698,296	\$4,813,249	\$4,931,015	\$5,051,662	\$5,175,261	\$5,301,884	\$5,431,605
Cumulative of Impacts (Cumulative)	\$58,476,699	\$62,953,259	\$67,539,348	\$72,237,644	\$77,050,893	\$81,981,908	\$87,033,570	\$92,208,831	\$97,510,715	\$102,942,321
	Year 21	Year 22	Year 23	Year 24	Year 25	Year 26	Year 27	Year 28	Year 29	Year 30
Operational Materials (Ongoing)	\$13,006,515	\$13,324,745	\$13,650,761	\$13,984,755	\$14,326,920	\$14,677,456	\$15,036,570	\$15,404,469	\$15,781,371	\$16,167,493
Local Material Purchase (10%)	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
Projected Local Purchases of Materials	\$1,300,651	\$1,332,474	\$1,365,076	\$1,398,475	\$1,432,692	\$1,467,746	\$1,503,657	\$1,540,447	\$1,578,137	\$1,616,749
Economic Multiplier Rate	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517	1.1517
Local Impact of Material Purchases	\$1,497,960	\$1,534,611	\$1,572,158	\$1,610,624	\$1,650,031	\$1,690,403	\$1,731,762	\$1,774,133	\$1,817,540	\$1,862,010
Operational Labor	\$3,404,672	\$3,487,974	\$3,573,314	\$3,660,743	\$3,750,310	\$3,842,069	\$3,936,073	\$4,032,377	\$4,131,037	\$4,232,111
Economic Multiplier Rate	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944
Economic Impact of Labor (Annually)	\$4,066,540	\$4,166,036	\$4,267,967	\$4,372,391	\$4,479,370	\$4,588,967	\$4,701,245	\$4,816,271	\$4,934,110	\$5,054,833
Aggregate of Impacts (Annual)	\$5,564,501	\$5,700,647	\$5,840,125	\$5,983,015	\$6,129,402	\$6,279,370	\$6,433,007	\$6,590,404	\$6,751,651	\$6,916,844
Cumulative of Impacts (Cumulative)	\$108,506,821	\$114,207,469	\$120,047,594	\$126,030,609	\$132,160,010	\$138,439,380	\$144,872,387	\$151,462,791	\$158,214,442	\$165,131,285
Notes:										
On-Site Construction Labor based on Prevailing Wage (inclusive) \$53.46. Estimated at 1,746 FTE (One-Year) Total Construction Labor or 3,632,622 craft hours										
Material Purchases estimated to increase by CPI (1.024467% Per Annum, Adjusted by Facility Size)										
Operational Labor estimated to increase by 2.4467% per annum (30-Year CPI)										
Multipliers based on RIMS II, Type 1 Categories 6, 7 & 48										
Project Size Defined as 2,025 MW of power for 1 hour, though only 1,500 MW is currently scheduled in this analysis (Market will dictate actual project side up to maximum amount)										
Land Purchase based on 148 Acres at \$8,000 Per Acre										
ConEd Indicates Nominal Land Leases that are not part of calculations										

Exhibit C
Governmental Revenues: (Years 1-30)
CED Westside Canal Battery Storage, LLC Imperial County, CA

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Construction Phase										
Construction Materials (Total Amount)	\$125,200,000		\$208,900,000		\$319,475,000		\$423,900,000		\$528,325,000	
Based 1% Local Sales Tax	\$1,252,000		\$2,089,000		\$3,194,750		\$4,239,000		\$5,283,250	
Public Health Allocation of Sales Tax .50%	\$626,000		\$1,044,500		\$1,597,375		\$2,119,500		\$2,641,625	
Public Safety Allocation of Sales Tax .50%	\$626,000		\$1,044,500		\$1,597,375		\$2,119,500		\$2,641,625	
Transportation-Regional Measure D Sales Tax (.50%) 33% to County	\$206,580		\$344,685		\$527,134		\$699,435		\$871,736	
Total Sales Taxes Collected Benefit of County of Imperial	\$2,710,580		\$4,522,685		\$6,916,634		\$9,177,435		\$11,438,236	
Property Taxes (During Construction and Operation)										
Projected Assessed Valuation (Land)	\$1,184,000	\$1,207,680	\$1,231,834	\$1,256,470	\$1,281,600	\$1,307,232	\$1,333,376	\$1,360,044	\$1,387,245	\$1,414,990
Facility Investment By Phase (Year)	\$148,000,000		\$233,000,000		\$356,500,000		\$473,000,000		\$589,500,000	
Permanent Building Assessed Value	\$5,000,000	\$5,100,000	\$16,227,000	\$16,551,540	\$35,115,165	\$35,817,468	\$63,335,730	\$64,602,445	\$102,830,880	\$104,887,498
Projected Assessed Valuation (Before Depreciation) (Phase 1)	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000
Depreciation Schedule for Phase 1 Facility Investment	95.00%	85.00%	75.00%	65.00%	55.00%	45.00%	35.00%	25.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 1)	\$135,850,000	\$121,550,000	\$107,250,000	\$92,950,000	\$78,650,000	\$64,350,000	\$50,050,000	\$35,750,000	\$28,600,000	\$28,600,000
Projected Assessed Valuation (Before Depreciation) (Phase 2)			\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000
Depreciation Schedule for Phase 2 Facility Investment			95.00%	85.00%	75.00%	65.00%	55.00%	45.00%	35.00%	25.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 2)			\$210,876,250	\$188,678,750	\$166,481,250	\$144,283,750	\$122,086,250	\$99,888,750	\$77,691,250	\$55,493,750
Projected Assessed Valuation (Before Depreciation) (Phase 3)					\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406
Depreciation Schedule for Phase 3 Facility Investment					95.00%	85.00%	75.00%	65.00%	55.00%	45.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 3)					\$321,354,036	\$287,527,295	\$253,700,555	\$219,873,814	\$186,047,073	\$152,220,333
Projected Assessed Valuation (Before Depreciation) (Phase 4)							\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087
Depreciation Schedule for Phase 4 Facility Investment							95.00%	85.00%	75.00%	65.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 4)							\$423,888,183	\$379,268,374	\$334,648,565	\$290,028,757
Projected Assessed Valuation (Before Depreciation) (Phase 5)									\$552,563,614	\$552,563,614
Depreciation Schedule for Phase 5 Facility Investment									95.00%	85.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 5)									\$524,935,433	\$469,679,072
Total Assessed Valuation of Facility for Property Tax Purposes	\$142,034,000	\$127,857,680	\$335,585,084	\$299,436,760	\$602,882,050	\$533,285,745	\$914,394,093	\$800,743,427	\$1,256,140,447	\$1,102,324,398
Base 1% Property Tax Amount	\$1,420,340	\$1,278,577	\$3,355,851	\$2,994,368	\$6,028,821	\$5,332,857	\$9,143,941	\$8,007,434	\$12,561,404	\$11,023,244
Year 11 to Year 30										
Projected Assessed Valuation (Land)	\$1,443,289	\$1,472,155	\$1,501,598	\$1,531,630	\$1,562,263	\$1,593,508	\$1,625,378	\$1,657,886	\$1,691,044	\$1,724,864
Facility Investment By Phase (Year)										
Permanent Building Assessed Value	\$106,985,248	\$109,124,953	\$111,307,452	\$113,533,601	\$115,804,273	\$118,120,358	\$120,482,765	\$122,892,421	\$125,350,269	\$127,857,274
Projected Assessed Valuation (Before Depreciation) (Phase 1)	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000
Depreciation Schedule for Phase 1 Facility Investment	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 1)	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000
Projected Assessed Valuation (Before Depreciation) (Phase 2)	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000
Depreciation Schedule for Phase 2 Facility Investment	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 2)	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000
Projected Assessed Valuation (Before Depreciation) (Phase 3)	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406
Depreciation Schedule for Phase 3 Facility Investment	35.00%	25.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 3)	\$118,393,592	\$84,566,852	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481
Projected Assessed Valuation (Before Depreciation) (Phase 4)	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087
Depreciation Schedule for Phase 4 Facility Investment	55.00%	45.00%	35.00%	25.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 4)	\$245,408,948	\$200,789,139	\$156,169,330	\$111,549,522	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617
Projected Assessed Valuation (Before Depreciation) (Phase 5)	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614
Depreciation Schedule for Phase 5 Facility Investment	75.00%	65.00%	55.00%	45.00%	35.00%	25.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 5)	\$414,422,711	\$359,166,349	\$303,909,988	\$248,653,626	\$193,397,265	\$138,140,904	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723
Total Assessed Valuation of Facility for Property Tax Purposes	\$959,648,787	\$828,114,447	\$713,536,449	\$615,916,860	\$540,651,899	\$487,742,868	\$462,508,965	\$464,951,128	\$467,442,134	\$469,982,960
Base 1% Property Tax Amount	\$9,596,488	\$8,281,144	\$7,135,368	\$6,159,169	\$5,406,519	\$4,877,429	\$4,625,090	\$4,649,511	\$4,674,421	\$4,699,830
Year 21 to Year 30										
Projected Assessed Valuation (Land)	\$1,759,362	\$1,794,549	\$1,830,440	\$1,867,049	\$1,904,390	\$1,942,477	\$1,981,327	\$2,020,954	\$2,061,373	\$2,102,600
Facility Investment By Phase (Year)										
Permanent Building Assessed Value	\$130,414,420	\$133,022,708	\$135,683,162	\$138,396,826	\$141,164,762	\$143,988,057	\$146,867,818	\$149,805,175	\$152,801,278	\$155,857,304
Projected Assessed Valuation (Before Depreciation) (Phase 1)	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000	\$143,000,000
Depreciation Schedule for Phase 1 Facility Investment	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 1)	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000	\$28,600,000
Projected Assessed Valuation (Before Depreciation) (Phase 2)	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000	\$221,975,000
Depreciation Schedule for Phase 2 Facility Investment	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 2)	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000	\$44,395,000
Projected Assessed Valuation (Before Depreciation) (Phase 3)	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406	\$338,267,406
Depreciation Schedule for Phase 3 Facility Investment	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 3)	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481	\$67,653,481
Projected Assessed Valuation (Before Depreciation) (Phase 4)	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087	\$446,198,087
Depreciation Schedule for Phase 4 Facility Investment	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 4)	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617	\$89,239,617
Projected Assessed Valuation (Before Depreciation) (Phase 5)	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614	\$552,563,614
Depreciation Schedule for Phase 5 Facility Investment	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%	20.00%
Assessed Valuation of Facility for Property Tax Purposes (Phase 5)	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723	\$110,512,723
Total Assessed Valuation of Facility for Property Tax Purposes	\$472,574,603	\$475,218,079	\$477,914,424	\$480,664,696	\$483,469,973	\$486,331,356	\$489,249,967	\$492,226,950	\$495,263,472	\$498,360,725
Base 1% Property Tax Amount	\$4,725,746	\$4,752,181	\$4,779,144	\$4,806,647	\$4,834,700	\$4,863,314	\$4,892,500	\$4,922,269	\$4,952,635	\$4,983,607
Total Projected Sales Taxes to County of Imperial	\$34,765,570									
Total Projected Gross Property Taxes to County of Imperial*	\$169,764,548									
Total Gross Income to the County of Imperial	\$204,530,118									

Notes:
1. Phasing Based on 9 Years, 1,500 MW Total
2. Project Land Size: Approximately 148 Acres (Owned) Additional 15 Acres Leased
3. Land/Improvement Assessed Value scheduled to increase in value 2% per year
4. Permanent Building: 50,000 Sq. Ft. Per 100MW
5. Permanent Building = \$100 PSF (Increases by 5% Per Year-Construction Costs)
6. TRA 069-007
7. Depreciation Schedule = Percentage of Valuation Used for Property Tax Purposes
8.* Projected Gross Property Taxes to County is NOT NET Amount to County
9. Depreciation Schedule based on industry information, NOT County information

Exhibit D

**County of Imperial Taxing Organization Benefit Chart
CED Westside Canal Battery Storage, LLC Imperial County, CA**

<i>Taxing Entity</i>	<i>Tax Percentage</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Year 4</i>	<i>Year 5</i>	<i>Year 6</i>	<i>Year 7</i>	<i>Year 8</i>	<i>Year 9</i>	<i>Year 10</i>	<i>Total (Years 1-10)</i>
<i>Standard Tax Allocation Land (1%)</i>		\$1,184,000	\$1,207,680	\$1,231,834	\$1,256,470	\$1,281,600	\$1,307,232	\$1,333,376	\$1,360,044	\$1,387,245	\$1,414,990	
<i>Permanent Building Improvements</i>		\$5,000,000	\$5,100,000	\$16,227,000	\$16,551,540	\$35,115,165	\$35,817,468	\$63,335,730	\$64,602,445	\$102,830,880	\$104,887,498	
<i>Battery Improvements (Depreciated Value)</i>		\$135,850,000	\$121,550,000	\$318,126,250	\$281,628,750	\$566,485,286	\$496,161,045	\$849,724,987	\$734,780,938	\$1,151,922,322	\$996,021,911	
Total		\$142,034,000	\$127,857,680	\$335,585,084	\$299,436,760	\$602,882,051	\$533,285,745	\$914,394,093	\$800,743,426	\$1,256,140,447	\$1,102,324,398	
<i>Base Level Property Tax Estimate</i>		\$1,420,340	\$1,278,577	\$3,355,851	\$2,994,368	\$6,028,821	\$5,332,857	\$9,143,941	\$8,007,434	\$12,561,404	\$11,023,244	\$61,146,837
<i>County of Imperial-General Fund</i>	0.37184102	\$528,141	\$475,427	\$1,247,843	\$1,113,429	\$2,241,763	\$1,982,975	\$3,400,092	\$2,977,493	\$4,670,845	\$4,098,894	\$22,736,902
<i>County General Fund- Net of ERAF</i>	0.20436825	\$290,272	\$261,301	\$685,829	\$611,954	\$1,232,099	\$1,089,867	\$1,868,731	\$1,636,465	\$2,567,152	\$2,252,801	\$12,496,472
<i>County Library</i>	0.01403855	\$19,940	\$17,949	\$47,111	\$42,037	\$84,636	\$74,866	\$128,368	\$112,413	\$176,344	\$154,750	\$858,413
<i>Fire Protection</i>	0.05707841	\$81,071	\$72,979	\$191,547	\$170,914	\$344,115	\$304,391	\$521,922	\$457,052	\$716,985	\$629,189	\$3,490,164
Total County Property Tax Income (Net)		\$391,283	\$352,229	\$924,487	\$824,904	\$1,660,851	\$1,469,123	\$2,519,020	\$2,205,930	\$3,460,481	\$3,036,741	\$16,845,049

<i>Taxing Entity</i>	<i>Tax Percentage</i>	<i>Year 11</i>	<i>Year 12</i>	<i>Year 13</i>	<i>Year 14</i>	<i>Year 15</i>	<i>Year 16</i>	<i>Year 17</i>	<i>Year 18</i>	<i>Year 19</i>	<i>Year 20</i>	<i>Total (Years 11-20)</i>
<i>Standard Tax Allocation Land (1%)</i>		\$1,443,289	\$1,472,155	\$1,501,598	\$1,531,630	\$1,562,263	\$1,593,508	\$1,625,378	\$1,657,886	\$1,691,044	\$1,724,864	
<i>Permanent Building Improvements</i>		\$106,985,248	\$109,124,953	\$111,307,452	\$113,533,601	\$115,804,273	\$118,120,358	\$120,482,765	\$122,892,421	\$125,350,269	\$127,857,274	
<i>Battery Improvements (Depreciated Value)</i>		\$851,220,250	\$717,517,340	\$600,727,799	\$500,851,629	\$423,285,364	\$368,029,002	\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	
Total		\$959,648,787	\$828,114,448	\$713,536,849	\$615,916,860	\$540,651,899	\$487,742,868	\$462,508,964	\$464,951,127	\$467,442,133	\$469,982,960	
<i>Base Level Property Tax Estimate</i>		\$9,596,488	\$8,281,144	\$7,135,368	\$6,159,169	\$5,406,519	\$4,877,429	\$4,625,090	\$4,649,511	\$4,674,421	\$4,699,830	\$60,104,969
<i>County of Imperial-General Fund</i>	0.37184102	\$3,568,368	\$3,079,269	\$2,653,223	\$2,290,232	\$2,010,366	\$1,813,628	\$1,719,798	\$1,728,879	\$1,738,142	\$1,747,589	\$22,349,493
<i>County General Fund- Net of ERAF</i>	0.20436825	\$1,961,217	\$1,692,403	\$1,458,243	\$1,258,739	\$1,104,921	\$996,792	\$945,221	\$950,212	\$955,303	\$960,496	\$12,283,547
<i>County Library</i>	0.01403855	\$134,721	\$116,255	\$100,170	\$86,466	\$75,900	\$68,472	\$64,930	\$65,272	\$65,622	\$65,979	\$843,787
<i>Fire Protection</i>	0.05707841	\$547,752	\$472,675	\$407,275	\$351,556	\$308,596	\$278,396	\$263,993	\$265,387	\$266,809	\$268,259	\$3,430,696
Total County Property Tax Income (Net)		\$2,643,690	\$2,281,333	\$1,965,688	\$1,696,760	\$1,489,416	\$1,343,659	\$1,274,144	\$1,280,872	\$1,287,734	\$1,294,734	\$16,558,030

<i>Taxing Entity</i>	<i>Tax Percentage</i>	<i>Year 21</i>	<i>Year 22</i>	<i>Year 23</i>	<i>Year 24</i>	<i>Year 25</i>	<i>Year 26</i>	<i>Year 27</i>	<i>Year 28</i>	<i>Year 29</i>	<i>Year 30</i>	<i>Total (Years 21-30)</i>
<i>Standard Tax Allocation Land (1%)</i>		\$1,759,362	\$1,794,549	\$1,830,440	\$1,867,049	\$1,904,390	\$1,942,477	\$1,981,327	\$2,020,954	\$2,061,373	\$2,102,600	
<i>Permanent Building Improvements</i>		\$130,414,420	\$133,022,708	\$135,683,162	\$138,396,826	\$141,164,762	\$143,988,057	\$146,867,818	\$149,805,175	\$152,801,278	\$155,857,304	
<i>Battery Improvements (Depreciated Value)</i>		\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	\$340,400,821	
Total		\$472,574,603	\$475,218,078	\$477,914,423	\$480,664,695	\$483,469,973	\$486,331,356	\$489,249,967	\$492,226,949	\$495,263,472	\$498,360,725	
<i>Base Level Property Tax Estimate</i>		\$4,725,746	\$4,752,181	\$4,779,144	\$4,806,647	\$4,834,700	\$4,863,314	\$4,892,500	\$4,922,269	\$4,952,635	\$4,983,607	\$48,512,742
<i>County of Imperial-General Fund</i>	0.37184102	\$1,757,226	\$1,767,056	\$1,777,082	\$1,787,309	\$1,797,740	\$1,808,379	\$1,819,232	\$1,830,302	\$1,841,593	\$1,853,110	\$18,039,028
<i>County General Fund- Net of ERAF</i>	0.20436825	\$965,792	\$971,195	\$976,705	\$982,326	\$988,059	\$993,907	\$999,872	\$1,005,956	\$1,012,161	\$1,018,491	\$9,914,464
<i>County Library</i>	0.01403855	\$66,343	\$66,714	\$67,092	\$67,478	\$67,872	\$68,274	\$68,684	\$69,102	\$69,528	\$69,963	\$681,049
<i>Fire Protection</i>	0.05707841	\$269,738	\$271,247	\$272,786	\$274,356	\$275,957	\$277,590	\$279,256	\$280,955	\$282,689	\$284,456	\$2,769,030
Total County Property Tax Income (Net)		\$1,301,873	\$1,309,156	\$1,316,584	\$1,324,160	\$1,331,888	\$1,339,771	\$1,347,811	\$1,356,012	\$1,364,378	\$1,372,910	\$13,364,543
Total Property Taxes (1% Base)	\$169,764,548											
Total Property Taxes to County (Gross)	\$63,125,423											
Total Net Property Tax to County	\$46,767,622											

Notes:

1. Allocations for TRA 69-007
2. Base Figures (Standard Tax Allocation for Land and Non-Solar Improvements) are in Projected Property Tax Generation (rather than Assessed Valuation)
3. ERAF reduces net to County (General Fund) by about 46% (County nets 54%)
4. Land is scheduled to increase by 2% per annum, Depreciation based on Schedule provided by County Assessor's Office in April, 2020
5. Gross Property Taxes to County are inclusive of all 1% Base Level Property Taxes
6. Net to County is post ERAF plus County Library and Fire Share

Exhibit E

**County of Imperial Taxing Organization Benefit Chart
Consolidated Property Tax Revenues (by allocation) Years 1-30
CED Westside Canal Battery Storage, LLC Imperial County, CA**

Taxing Entity	Est. Total Property Tax Generation	Approximate % to Taxing Entity	Total Property Taxes
County of Imperial-General Fund (Gross)	\$169,764,548	0.37184102	\$63,125,423
County of Imperial-General Fund (Net)*	\$169,764,548	0.20436825	\$34,694,484
County Library*	\$169,764,548	0.01403855	\$2,383,248
Fire Protection*	\$169,764,548	0.05707841	<u>\$9,689,890</u>
Total Net Property Taxes to County			<u>\$46,767,622</u>
<i>Notes:</i>			
1. County General Fund Amounts are Reduced by about 46% to Account for ERAF (Education Revenue Augmentation Fund)			
2. Total Property Tax Generation taken from Exhibit B			
3. Tax Rate Area Schedules 69-007			
* Denotes those items that are part of funding available to pay for General County Services			

Exhibit F		
Local Taxing Jurisdiction Tax Allocation Estimate		
CED Westside Canal Battery Storage, LLC Imperial County, CA		
Local Taxing Jurisdiction Tax Allocation Estimate		
	TRA 69-007	Percentage
	Allocated Base Tax Amount (Exhibit D)	Amount
		100% \$169,764,548
1	County General Fund*	0.37184102 \$63,125,423
2	County Library	0.01403855 \$2,383,248
3	Fire Protection	0.05707841 \$9,689,890
4	Central Valley Cemetary	0.02642244 \$4,485,594
5	Imperial Community College	0.09203595 \$15,624,441
6	Imperial Unified	0.41642335 \$70,693,922
7	Children's Institution Tuition	0.00128791 \$218,641
8	Physically Handicapped	0.00681693 \$1,157,273
9	Trainable Severely Mentally Retarded	0.00251166 \$426,391
10	Juvenile Hall	0.00042532 \$72,204
11	Aurally Handicapped	0.00331131 \$562,143
12	County Superintendent of Schools	0.00495214 \$840,698
13	Development Center	0.00285501 \$484,679
Add-On Allocations (Special Taxes Voter Approved)		
14	Imperial Community College Bond 2004	0.04670 \$7,928,004
15	Imperial USD 2016 REF BD	0.04570 \$7,758,240
16	Imperial USD 2016 Series A	0.03970 \$6,739,653
17	Imperial USD Elect 2016 Series B	0.00810 \$1,375,093
18	Imperial USD Elect 2016 Series C	0.0011 \$186,741
19	Total of "Add-On" (Voter Approved) Property Taxes	0.14130 \$23,987,731
Projected Total Benefit to Local Taxing Jurisdictions**		
1	County General Fund	\$63,125,423
2	County Library	\$2,383,248
3	Fire Protection	\$9,689,890
4	Central Valley Cemetary	\$4,485,594
5	Imperial Community College	\$23,552,446
6	Imperial Unified	\$86,753,648
7	Children's Institution Tuition	\$218,641
8	Physically Handicapped	\$1,157,273
9	Trainable Severely Mentally Retarded	\$426,391
10	Juvenile Hall	\$72,204
11	Aurally Handicapped	\$562,143
12	County Superintendent of Schools	\$840,698
13	Development Center	\$484,679
Total Estimated Property Taxes Paid for Benefit of Agencies within Imperial County		\$193,752,279
Notes:		
1	TRA 69-007	
2	*County General Fund allocation is reduced by 46% for Educational Revenue Augmentation Fund Allocation (County is Negative ERAF Jurisdiction and ERAF funds reallocated by State of California directly)	
3	Shown in full 30 years, though tax issue/bonds likely expire prior to end of 30-year life of Con Edison Project(s)	
4	Total Base Level Tax Generation (Exhibits D & E):	\$169,764,548
5	**Includes All-Ons	

Exhibit G

**Projected Employment Impacts of Subject Site
CED Westside Canal Battery Storage, LLC Imperial County, CA**

Year	1	2	3	4	5	6	7	8	9	10
Construction Craft Hours (Annual)	426487		429529		628745		794447		943108	
Number of FTE (1-Year) Labor Staff (2080 hours)	205.04		206.50		302.28		381.95		453.42	
Average Craft Pay Per Hour	\$36.56		\$38.20		\$40.10		\$42.08		\$44.17	
Average Craft Fully Burdened Payroll Per Hour	\$53.46		\$56.11		\$58.89		\$61.80		\$64.87	
Annualized Wage/Benefit Per Construction Emp.	\$111,197		\$116,705		\$122,485		\$128,552		\$134,920	
Total Construction Wages/Benefits	\$22,800,000		\$24,100,000		\$37,025,000		\$49,100,000		\$61,175,000	
Number of Projected Operational Employees	4	4	7	7	11	11	16	16	20	20
Operational Wage (inclusive of 30% benefits)	\$461,500	\$472,792	\$811,813	\$831,676	\$1,303,097	\$1,334,980	\$1,953,775	\$2,001,578	\$2,547,415	\$2,609,742
Total All Wages/Benefits	\$23,261,500	\$472,792	\$811,813	\$831,676	\$1,303,097	\$1,334,980	\$1,953,775	\$2,001,578	\$2,547,415	\$2,609,742
RIMS II Payroll Multiplier Construction Jobs	1.1331	1.1331	1.1331	1.1331	1.1331	1.1331	1.1331	1.1331	1.1331	1.1331
RIMS II Payroll Multiplier Utility Operation Jobs	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944
RIMS II Jobs Multiplier Construction Jobs	1.1859	1.1859	1.1859	1.1859	1.1859	1.1859	1.1859	1.1859	1.1859	1.1859
RIMS II Jobs Multiplier Utility Operation Jobs	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498
Projected Payroll in Region (Construction) w/Multiplier	\$25,834,680	\$0	\$27,307,710	\$0	\$41,953,028	\$0	\$55,635,210	\$0	\$69,317,393	\$0
Projected Payroll in Region (Utility Operation) w/Multiplier	\$551,216	\$564,703	\$969,629	\$993,354	\$1,556,419	\$1,594,500	\$2,333,589	\$2,390,685	\$3,042,632	\$3,117,076
Projected total Jobs (Construction) with Multiplier	243.16	0.00	244.8933	0.0000	358.4751	0.0000	452.9491	0.0000	537.7073	0.0000
Projected total Jobs (Utility Operation) with Multiplier	5.80	5.80	10.15	10.15	15.95	15.95	23.20	23.20	29.00	29.00
Total Projected Payroll (Complete Project) w/Multipliers	\$26,385,896	\$564,703	\$28,277,339	\$993,354	\$43,509,447	\$1,594,500	\$57,968,799	\$2,390,685	\$72,360,025	\$3,117,076
Total Projected Jobs (Complete Project) w/Multipliers	248.96	5.80	255.04	10.15	374.42	15.95	476.15	23.20	566.70	29.00
Year	11	12	13	14	15	16	17	18	19	20
Number of Projected Operational Employees	20	20	20	20	20	20	20	20	20	20
Operational Wage (inclusive of 30% benefits)	\$2,673,595	\$2,739,009	\$2,806,025	\$2,874,680	\$2,945,015	\$3,017,070	\$3,090,889	\$3,166,514	\$3,243,989	\$3,323,359
RIMS II Payroll Multiplier Utility Operation Jobs	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944
RIMS II Jobs Multiplier Utility Operation Jobs	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498
Projected Payroll in Region (Utility Operation) w/Multiplier	\$3,193,341	\$3,271,473	\$3,351,516	\$3,433,517	\$3,517,525	\$3,603,589	\$3,691,758	\$3,782,084	\$3,874,620	\$3,969,420
Projected total Jobs (Utility Operation) with Multiplier	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00
Total Projected Payroll (Complete Project) w/Multipliers	\$3,193,341	\$3,271,473	\$3,351,516	\$3,433,517	\$3,517,525	\$3,603,589	\$3,691,758	\$3,782,084	\$3,874,620	\$3,969,420
Total Projected Jobs (Complete Project) w/Multipliers	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00
Year	21	22	23	24	25	26	27	28	29	30
Number of Projected Operational Employees	20	20	20	20	20	20	20	20	20	20
Operational Wage (inclusive of 30% benefits)	\$3,404,672	\$3,487,974	\$3,573,314	\$3,660,743	\$3,750,310	\$3,842,069	\$3,936,073	\$4,032,377	\$4,131,037	\$4,232,111
RIMS II Payroll Multiplier Utility Operation Jobs	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944	1.1944
RIMS II Jobs Multiplier Utility Operation Jobs	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498	1.4498
Projected Payroll in Region (Utility Operation) w/Multiplier	\$4,066,540	\$4,166,036	\$4,267,967	\$4,372,391	\$4,479,370	\$4,588,967	\$4,701,245	\$4,816,271	\$4,934,110	\$5,054,833
Projected total Jobs (Utility Operation) with Multiplier	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00
Total Projected Payroll (Complete Project) w/Multipliers	\$4,066,540	\$4,166,036	\$4,267,967	\$4,372,391	\$4,479,370	\$4,588,967	\$4,701,245	\$4,816,271	\$4,934,110	\$5,054,833
Total Projected Jobs (Complete Project) w/Multipliers	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00	29.00
Total Project Impact of Wages (W/Construction)	\$318,298,398									
Total Projected Impact of Wages (WO Construction)	\$98,250,378									
Notes:										
1. Market Wage is based on average of unionized construction trades estimated for 2Q2020 average wage of \$36.56 and fully burdened of \$53.46 (not inclusive of weekends/overtime)										
2. Labor Wage for Construction Adjusted by CPI (2.4467%) for Phases 2-9 (Annual Adjustment)										
3. Phase Calculations shown in whole year (Phase 1 may be 15 months in total)										
3. Operational Wages based budget figures provided by Con Edison										
State of California Department of Industrial Relations	Development Management Group, Inc.									
State Employment Development Department	Con Edison									
RIMS II	United States Department of Labor									

Exhibit H			
Projected Costs for County to Provide General Government Services to Population			
County of Imperial, California			
#	Department/Unit	Item	2019-20 Adopted Budget
General Government			
1	Administration	County Pension Bonds-1997	\$5,980,848
2	Legislative and Admin	Entire Section	\$4,736,982
3	Finance	Entire Section	\$7,465,791
4	County Counsel	Entire Section	\$2,619,200
5	Personnel	Entire Section	\$2,346,878
6	Equal Employment Opportunity	Entire Section	\$167,644
7	Elections	Entire Section	\$1,133,600
8	Property/Facility Management	Entire Section	\$5,584,858
9	Other General	Entire Section	\$442,310
10	Recreational Facilities	Entire Section	\$445,180
Public Protection			
11	Other Assistance	Entire Section	\$104,375
12	Administration	Entire Section	\$1,402,611
13	Judicial	Entire Section	\$20,461,830
14	Police Protection	Entire Section	\$20,374,826
15	Detention and Correction	Entire Section	\$28,338,526
16	Fire Protection	Entire Section	\$7,893,167
17	Protective Inspection	Entire Section	\$6,123,822
18	Other Protection	Entire Section	\$22,117,608
19	Resource Conservation	Entire Section	\$20,700
Public Ways & Facilities			
17	Public Ways	Entire Section	\$16,197,160
Health and Sanitation			
18	Health	Entire Section	\$103,360,842
19	Sanitation	Entire Section	\$2,736,181
Public Assistance			
20	Administration-Workforce Development	Entire Section	\$11,182,479
21	Security-Sheriff	Entire Section	\$1,073,337
22	Administration-Social Services	Entire Section	\$51,029,356
23	Categorical AIDS	Entire Section	\$60,204,906
24	General Relief	Entire Section	\$277,250
25	Veterans Services	Entire Section	\$342,878
26	Other Assistance	Entire Section	\$46,631,640
Education			
27	Health	Entire Section	\$461,650
28	Agriculture Education	Entire Section	\$446,739
29	Library Services	Entire Section	\$670,048
30	Other Education	Entire Section	\$101,000
Recreation			
31	Recreation Facilities	Entire Section	\$809,555
Contingency			
32	Contingency	Entire Section	\$200,000
Total of Governmental Expenditures/Responsibilities			\$433,485,777
Total Number of Residents of Imperial County (2018 CA Dept. of Finance E-1)			188,821
Total Spending Per Resident of Imperial County			\$2,295.75
Notes:			
A	Item 16 Net of City of Imperial Fire Contract		
B	Based on Schedule 8 of County of Imperial Government Funds Detail of Financing Uses by Function, Activity and Budget Unit		
C	FY 2019-20 Adopted Budget (Adopted October 1, 2019) utilized. FY 19-20 Budget Considered Constrained (Due to Covid-19)		

Exhibit I

**Projected Costs for County of Imperial to Provide General Government Services as Result of:
CED Westside Canal Battery Storage, LLC Imperial County, CA**

Item	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Number of Projected Construction Jobs (FTE)	205.04	0	206.5	0	302.28	0	381.95	0	453.42	0
Number of Projected Operational Jobs (FTE)	4	4	7	7	11	11	16	16	20	20
Total Jobs (construction & Operational) (FTE)	209.04	4	213.5	7	313.28	11	397.95	16	473.42	20
Ave. Number of Persons Per Household	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87
Estimated Persons Supported by Gen Govt.	808.98	15.48	826.245	27.09	1212.3936	42.57	1540.0665	61.92	1832.1354	77.4
Cost Per Person (General Govt.)	\$2,296	\$2,352	\$2,409	\$2,468	\$2,529	\$2,591	\$2,654	\$2,719	\$2,786	\$2,854
Estimated Cost to Provide General County Govt. Services	\$1,857,227	\$36,408	\$1,990,808	\$66,869	\$3,065,915	\$110,285	\$4,087,445	\$168,361	\$5,103,474	\$220,875
Item	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20
Number of Projected Operational Jobs (FTE)	20	20	20	20	20	20	20	20	20	20
Ave. Number of Persons Per Household	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87
Estimated Persons Supported by Gen Govt.	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4
Cost Per Person (General Govt.)	\$2,924	\$2,995	\$3,068	\$3,143	\$3,220	\$3,299	\$3,380	\$3,463	\$3,547	\$3,634
Estimated Cost to Provide General County Govt. Services	\$226,280	\$231,816	\$237,488	\$243,298	\$249,251	\$255,350	\$261,597	\$267,998	\$274,555	\$281,272
Item	Year 21	Year 22	Year 23	Year 24	Year 25	Year 26	Year 27	Year 28	Year 29	Year 30
Number of Projected Operational Jobs (FTE)	20	20	20	20	20	20	20	20	20	20
Ave. Number of Persons Per Household	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87	3.87
Estimated Persons Supported by Gen Govt.	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4	77.4
Cost Per Person (General Govt.)	\$3,723	\$3,814	\$3,907	\$4,003	\$4,101	\$4,201	\$4,304	\$4,409	\$4,517	\$4,628
Estimated Cost to Provide General County Govt. Services	\$288,154	\$295,205	\$302,427	\$309,827	\$317,407	\$325,173	\$333,129	\$341,280	\$349,630	\$358,184
Total Cost to Provide General Government Services	\$22,456,990									
Notes:										
Cost Per Person for General Government is adjusted by the 30 year average Consumer Price Index of 2.4467 (1990-2019)										

