Decision Letter

December 9, 2025

Christian Gonzales
400 S. Sierra Avenue
Solana Beach, CA 92075

Sent via email to christian@enersmartstorage.com

SUBJECT: DECISION ON DETERMINATION OF SIMILARITY (DOS-000687-2025)

Site Addresses:	1474 E. Franklin Avenue (AIN: 8328014040)	1158 East End Avenue (AIN: 8327024012)
Zoning District:	Workplace District 2 [LM4-G2-I3]	Workplace District 3 [LM4-G2-I2]
General Plan Designation:	Workplace District Special District, 0 du/acre	Workplace District Special District, 0 du/acre
Request:	Determination of Similarity for a Battery Energy Storage System (BESS) facility.	

On November 5, 2025, the Planning Division received an application for a Determination of Similarity, a request to determine that a Battery Energy Storage System is similar to a use permitted by the Pomona Zoning and Development Code (PZDC). Pursuant to Section 530.A.2, the Development Services Director has determined that the proposed Battery Energy Storage System use is not similar to an already listed use; therefore, the request is hereby DENIED. The decision is based on the following determinations:

USE CATEGORY & SPECIFIC USE.

Pursuant to Section 530.A.2. of the PZDC, the Development Services Director will first determine what use category the use is most similar to and then determine what specific use within that use category the use is most similar to.

Based on the submitted application materials, the Development Services Director has determined the following use category and specific use for comparison analysis:

USE CATEGORY	INFRASTRUCTURE
SPECIFIC USE	Public Utility Substation/Facility
	Any utility infrastructure providing services and having considerable impacts on adjacent lots, often including on-site staff. Includes active power generation facilities; passive energy generation such as wind turbine, geothermal system, and solar photo-voltaic system with supporting on-site storage; control and transmission equipment; storm water retention or detention ponds; aeration and septic system; reservoir, lift station, water supply well and water tank or tower; telecommunications switching facility; electrical substation; wastewater treatment; water supply treatment.

CRITERIA.

Pursuant to Section 530.A.2. of the PZDC, the Development Services Director has the responsibility for determining whether the proposed use is similar to an already listed use. When determining whether a proposed use is similar to an already listed use, the Development Services Director must consider the following criteria:

1. The actual or projected characteristics of the proposed use.
2. The relative amount of lot area or floor area and equipment devoted to the proposed use.
3. Relative amounts of sales.
4. The customer type.
5. The relative number of employees.
6. Hours of operation.
7. Building and site arrangement.
8. Types of vehicles used and their parking demands.
9. The number of vehicle trips generated.
10. How the proposed use is advertised.
11. The likely impact on surrounding properties.
12. The amount of outdoor storage that might be anticipated.
13. The amount truck traffic that might be generated.

ANALYSIS.

The following analysis has been conducted pursuant to Section 530.A.2. of the PZDC.

A. Characteristics

A Public Utility Substation/Facility contemplates utility infrastructure intended for a number of purposes including but not limited to power generation, water treatment, and electrical substation. These types of utility infrastructure have primary functions that are focused on the active/passive energy generation, treatment, control, distribution, or transmission of a utility. An electrical substation, for instance, transforms voltage and distributes electricity through the electrical grid; it does not as a primary use store energy. The utility infrastructure related to the electrical grid contemplated with a Public Utility Substation/Facility use all serve as pass-through energy facilities and do not contemplate energy storage as a primary use, but only as an accessory use categorized as "on-site supporting storage" (e.g., solar panels with a battery backup).

In contrast, a BESS Facility has one primary function, the large-scale storage and subsequent discharge of energy taken from the electrical grid, and is not an "on-site supporting storage." It essentially functions as a storage facility disconnected from any on-site generation. BESS facilities act as a large-scale energy reservoir, charging from the grid when power is in surplus and discharging during peak demand. These facilities do not serve as pass-through energy facilities, but rather is the industrial storage and release of a commodity, a stark contrast.

B. Operations & Number of Employees

A Public Utility Substation/Facility explicitly notes that such facilities "often including on-site staff." This language contemplates facilities like water treatment plants or power generation stations that require regular human oversight and maintenance, a typical operational model for utility infrastructure.

In contrast, a stand-alone BESS as described in the submitted application describes that they are "generally an unmanned operation with remote monitoring" with no permanent on-site staff. The application states 1-2 personnel visiting only for occasional maintenance. This operational difference creates distinct land use challenges related to emergency response protocols, security, and public oversight that differ significantly from a staffed facility and require different considerations.

C. Impact on Surrounding Properties

The definition explicitly describes a Public Utility Substation/Facility as "having considerable impacts on adjacent lots" (Section 530.E.3). While both a BESS and a traditional substation have impacts, the nature and character of those impacts are fundamentally different. The impacts of a BESS are unique and again require different considerations. These impacts include:

- Risk of Fire: The potential for thermal runaway in lithium-ion batteries presents a significant fire suppression challenge that is distinct from the risks associated with traditional utilities.
- Risk of Explosion: Due to a number of factors including but not limited to the chemical composition of the proposed BESS, there is a risk of catastrophic explosion that is distinct from the risks associated with traditional utilities.
- Chemical Hazards: The materials within the batteries pose unique containment and environmental risks.
- Noise: A BESS requires extensive, 24/7 HVAC and cooling systems, which can generate a constant, significant noise profile different from the intermittent hum of a traditional substation.
- Perceived Risk: BESS facilities have a unique perceived fire and explosion risk that requires unique considerations for property owners adjacent to BESS facilities including property value and insurance costs.

While the definition of Public Utility Substation/Facility generalizes the term "considerable impacts", BESS facilities have a unique and potentially more hazardous impact profile – a profile the PZDC has not been written to evaluate or mitigate under the "Public Utility" use classification.

CONCLUSION.

Pursuant to the criteria listed in Section 530.A.2. of the PZDC and the application material submitted, a stand-alone BESS facility is functionally distinct from the uses listed in the Public Utility Substation/Facility definition. There is no existing land use that adequately or permissively addresses its specific function, operational profile, and impact characteristics.

DECISION.

Therefore, based on the analysis contained herein and pursuant to the authority granted to the Development Services Director under Section 530.A.2 of the PZDC, a stand-alone Battery Energy Storage System (BESS) as a primary use is determined not to be similar to a Public Utility Substation/Facility.

Pursuant to Section 530.A., where a proposed use is found by the Development Services Director to not be similar to an already listed use, the use is only permitted following a zoning text amendment. Please note that determinations of similarity approved or denied are not site specific. Determinations of similarity are applicable to all Zoning Districts.

APPEALS.

Pursuant to Section 1170.E., the decision of the Development Services Director regarding a Director Determination shall be final unless an appeal is made within 20 calendar days following the decision. All appeals shall be filed pursuant to Section 1130.C.. All appeals shall be scheduled for review by the Planning Commission. The Planning Commission serves as the final approving authority on Director Determinations.

Betty Donavanik
Development Services Director

12/10/2025
Date

Application Package Submitted for DOS-000687-2025

Planning Application

Property Location and Zoning (print or type)

Property Address: 1474 Franklin Avenue & 1158 East End Ave Pomona, CA Zip Code: 91766

Assessor's Parcel No(s): 8328-014-040 & 8327-024-012

Cross Streets: Franklin & East End / Grand & East End

Permit Requested (Please check all applicable boxes)

Please include the supplemental application form when submitting your application.

AMENDMENTS - [A]

___ General Plan Amendment
___ Zoning Code Amendment
___ Specific Plan Amendment
___ Zone Change

CONDITIONAL USES - [C]

___ Conditional Use Permit
___ Conditional Use Permit Modification
___ Conditional Use Permit Revocation
___ Wireless Telecommunications Facility Permit

DESIGN - [D]

___ Development Plan Review
___ Variance
___ SB 330

ENVIRONMENTAL - [E]

___ Initial Study
___ Mitigated Negative Declaration
___ Environmental Impact Report

HISTORIC - [H]

___ Designation
___ Determination of Historic Significance
___ Certificate of Appropriateness - Major
___ Certificate of Deconstruction
Certificate of Economic Hardship

SUBDIVISIONS - [S]

___ Tentative Parcel Map
___ Tentative Tract Map
___ Map Correction / Amendment

X Other: Determination of Similarity

PLANNING USE ONLY

File No(s).: DOS - 000 067 - 2025
GP Place Type: _____
Zoning District [String]: _____
Date Submitted: 11/5/2025
Received By: _____

Owner / Applicant Information

Property Owner: Robert Kasner

Address: 11584 EASTEND AVE

City: Chino State: CA Zip Code: 91710

Phone: E-mail:

Cell / Other Phone:

Note: Attach additional lists for multiple property owners. If the property owner or applicant is a trust, partnership, corporation or LLC, on a separate sheet, provide a listing of all persons that make-up the trust, partnership, corporation or LLC

Applicant: Enersmart Storage LLC

Address: 400 S. Sierra Ave

City: Solona Beach State: CA Zip Code: 92075

Phone: Cell / Other E-mail:

Phone:

Applicant's Representative: Christian Gonzales

Address: 400 S. Sierra Ave

City: Solona Beach State: CA Zip Code: 92075

Phone: E-mail:

Cell / Other Phone:

Note: Prior to submittal of this application, it is advised that the applicant review the requested proposal with the Planning Division in order to review ordinance requirements and consistency with the General Plan. In completing the application form, please be as accurate and complete as possible.

Applicant Certification

I hereby certify that the statements furnished in this application and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. In addition, I understand that the filing of this application grants the City of Pomona permission to reproduce submitted materials, including but not limited to, plans, exhibits, and photographs, for distribution to staff, Commission, and City Council Members, and other Agencies in order to process the application, and to make those materials available to the public on the City of Pomona's web site and cable channel, notwithstanding Health & Safety Code § 19851 or any other provision of law. Nothing in this consent, however, shall entitle any person to make use of the intellectual property in plans, exhibits and photographs for any purpose unrelated to the City's consideration of this application.

Furthermore, I hereby agree to defend, indemnify, and hold harmless the City of Pomona or its agents, officers, and employees, from any claim, action or proceeding against the City of Pomona or its agents, officers or employees, to attack, set aside, void, or annul any approval by the City of Pomona, whether by its City Council, Planning Commission, or other authorized board or officer, as it pertains to this application. The City of Pomona shall promptly notify the applicant of any such claim, action or proceeding, and the City of Pomona shall cooperate fully in the defense.

Signature: _____ Date: 11/3/2025

Name (*print or type*): Christian Gonzales Phone: _____

Consent by Property Owner

If applicant is other than property owner, owner must sign consenting to filing. Attach additional sheets if necessary. Originals signatures only. Fax copies of owner's signature will not be accepted.

I/We, as the owner(s) of the subject property, consent to the filing of this application. We further consent and hereby authorize City representative(s) to enter upon my property for the purpose of examining and inspecting the property in preparation of any reports and/or required environmental review for the processing of the application(s) being filed. Attach additional sheets if necessary.

_____	_____	11-5-25
Robert KASNER		
Signature(s)	Name(s) (please print or type)	Date

Note: This application being signed under penalty of perjury and does not require notarization.

ENERSMART PROJECT DESCRIPTION AND OPERATIONAL STATEMENT

1. Project Description

1.1 Project Background and Objectives

Renewable energy from wind and solar is clean but intermittent—unavailable at night or without wind. Battery Energy Storage Systems (BESS) store excess power generated during peak production (e.g., sunny days) and release it during high demand, ensuring reliable clean energy supply and preventing blackouts from sudden drops in output.

BESS stabilizes grid fluctuations, buffering peaks and enabling long-term storage. Scaling up from consumer batteries, utility-scale BESS handles grid-level volumes to meet rising electricity demands.

Project Details The Pomona BESS projects comprise two co-located facilities using safe Lithium Iron Phosphate (LFP) batteries:

- **BESS 1**: 9 MW/60 MWh, 0.84 acres disturbed at 1474 Franklin Ave.
- **BESS 2**: 12 MW/80 MWh, 1.05 acres disturbed at 1158 East End Ave.

LFP technology provides stable, durable storage with efficient thermal management. Modular enclosures (~40 ft L x 8 ft W x 10 ft H) integrate DC batteries, inverters, thermal systems, and SCADA software for predictive dispatch. Sites feature 8-ft screened fencing with anti-climb tops and drought-tolerant native landscaping.

Projects interconnect directly to SCE's Francis Substation, delivering 21 MW dispatchable capacity and voltage support to local circuits—enhancing reliability for 10,000+ households, reducing blackout risks, and supporting renewables without transmission upgrades. Sites in buffered industrial zones.

Our operations:

Our BESS facilities operate by storing electricity during periods of low demand or high renewable generation and discharging it during peak demand. The system uses advanced predictive analytics to optimize charging and discharging cycles, ensuring grid stability and efficient energy use. Operations are monitored remotely and not anticipated to have onsite staff. Periodic maintenance is expected. The facility does not produce emissions, and generates low noise (under 60 dBA at property line), making it compatible with industrial zones. Operations align with FERC-authorized wholesale market participation (per Federal Power Act §§ 201/203; Chula Vista precedent, November 26, 2021), ensuring minimal on-site activity, environmental impacts, and community disruption.

Our Business Model:

We participate in Californias energy markets, managed by the California Independent System Operator (CAISO), providing services such as energy arbitrage and frequency regulation. Additionally, we secure Resource Adequacy agreements with utility providers to ensure reliable capacity during peak periods, supporting Californias grid reliability mandates. Our operations are regulated by the California Public Utilities Commission for state-level compliance and the Federal Energy Regulatory Commission for interstate energy market activities, ensuring adherence to safety, environmental, and operational standards.

Regulation

Regulated by FERC as public utility (Chula Vista precedent: authorized Nov. 26, 2021; revised tariff Mar. 9, 2023; Federal Power Act §§201/203). Secures SCE interconnection and CAISO agreements for frequency control/ancillaries.

Outcomes (140 MWh storage total):

- **Resilience**: Backup power/outage mitigation, stabilizing SCE grid for critical sites.
- **Renewables Support**: Advances CA 100% clean energy by 2045; zero emissions/odors/water use.
- **Cost Savings**: Charges low-demand/low-cost; discharges peaks—lowers rates, cuts business downtime.
- **Health/Safety**: Displaces fossil/nuclear; instant response reduces reserves/emissions. Aligns with SCE mandates, Pomona's ACTS Grant ($22M/100+ sites) & Power Choice ($1.5M/1,000+ homes).

Developer: EnerSmart Storage LLC (Solana Beach, CA)—decades in BESS/renewables. Visit www.enersmartstorage.com.

1.2 Project Location

Sites: 1474 Franklin Ave & 1158 East End Ave, Pomona (Appendix I aerials).

1.3.1 Surrounding Uses

Industrial zones (LM4-G2-I2/I3). BESS 1 adjoins manufacturing/warehousing (N/E), buffered residential (S/W). BESS 2 fully industrial-bordered; Francis Substation nearby for underground tie-in.

1.3.2 Project Site

Underutilized, flat parcels (~1,000 ft elevation): BESS 1 (~2 acres total); BESS 2 (~3 acres total). Previously low-use industrial.

1.3.3 Off-Site Improvements

20-ft access driveways, bioswales for infiltration, SCE utility easements. Frontage improvements as needed.

1.3.4 Land Use and Zoning

LM4-G2-I2/I3 (Limited Manufacturing). BESS aligns with PZDC §530.2 as similar to Public Utility/Substation (functional: control/transmission equipment, on-site storage—no ownership mandates). Supports General Plan/Climate Action Plan.

1.5 Project Characteristics

1.5.1 Project Components

21 MW/140 MWh total in 1.89 acres fenced area. Modular LFP enclosures on pads plus inverters/transformers/ancillaries for SCE/CAISO. Key equipment:

- LFP battery racks (spec sheet attached).
- PCS/inverters (3 MVA, <75 dBA).
- HVAC/thermal systems.
- NFPA 855 fire suppression (smoke detection/monitoring).
- Switchgear/SCADA/telecom.
- Transformers/security (fencing/lights/signage).

1.5.2 Utilities and Stormwater

No restrooms/sewer; construction water trucked. LA County MS4-compliant retention/BMPs (swales, erosion controls).

1.5.3 Parking

None required; remote ops. Use existing for maintenance.

1.5.4 Access Roads

Via public streets (Franklin/East End); gated entrances only.

1.5.5 Landscaping/Open Space

Native screening per Fire Code; monthly local maintenance. Permeable gravel; 8-ft fencing/downlit LEDs. Design Review: Hedges/decoratives for full visual integration.

1.5.6 Project Operations

Q4 2027 start; 20-year life. Remote by EnerSmart (no facilities/staff). Maintenance (1–2 personnel):

- Fire/HVAC: 2x/year.
- Batteries/testing: 1x/year.
- Relays: 2x/year.

Safety: Auto/manual breakers; isolation on faults/fires. Decommission: Recycle all; remove pads.

Public Utility Status

Project is anticipated to be officially designated as a public utility under the Federal Power Act Sections 201 and 203, as confirmed by FERC authorization granted on November 26, 2021, for our Chula Vista BESS project (effective December 12, 2021; revised market-based rate tariff accepted March 9, 2023). This designation stems from our engagement in interstate wholesale sales of energy, capacity, and ancillary services into CAISO markets, subjecting us to FERC jurisdiction (16 U.S.C. §§ 824, 824b) and aligning our operations with utility infrastructure functions outlined in Pomona Zoning & Development Code Sec. 530.E.3.

1.5.7 Decommissioning:

At end-of-life (~20 years), EnerSmart will fully decommission sites to restore pre-project conditions, compliant with local regulations and CEQA.

- **Power-Down/Site Isolation**: Remote/manual shutdown of all systems; disconnect from SCE grid.
- **Equipment Removal**: Dismantle/recycle batteries (via manufacturer programs, 95% recyclable LFP materials), inverters, transformers, and switchgear. Hazardous materials handled per RCRA standards.
- **Site Restoration**: Demolish concrete pads/foundations; grade/backfill disturbed areas (~1.89 acres); replant native vegetation to match surrounding industrial buffers. No long-term contamination risks (zero emissions ops).
- **Monitoring/Reporting**: Post-decommission soil/water tests; annual reports to City for 2 years. Cost: ~$5M (self-funded); no City liability. Ensures reversible, low-impact legacy.

- *Image: Rending of an Enersmart Project (For general Illustrative Purposes, Not Site Specific)*

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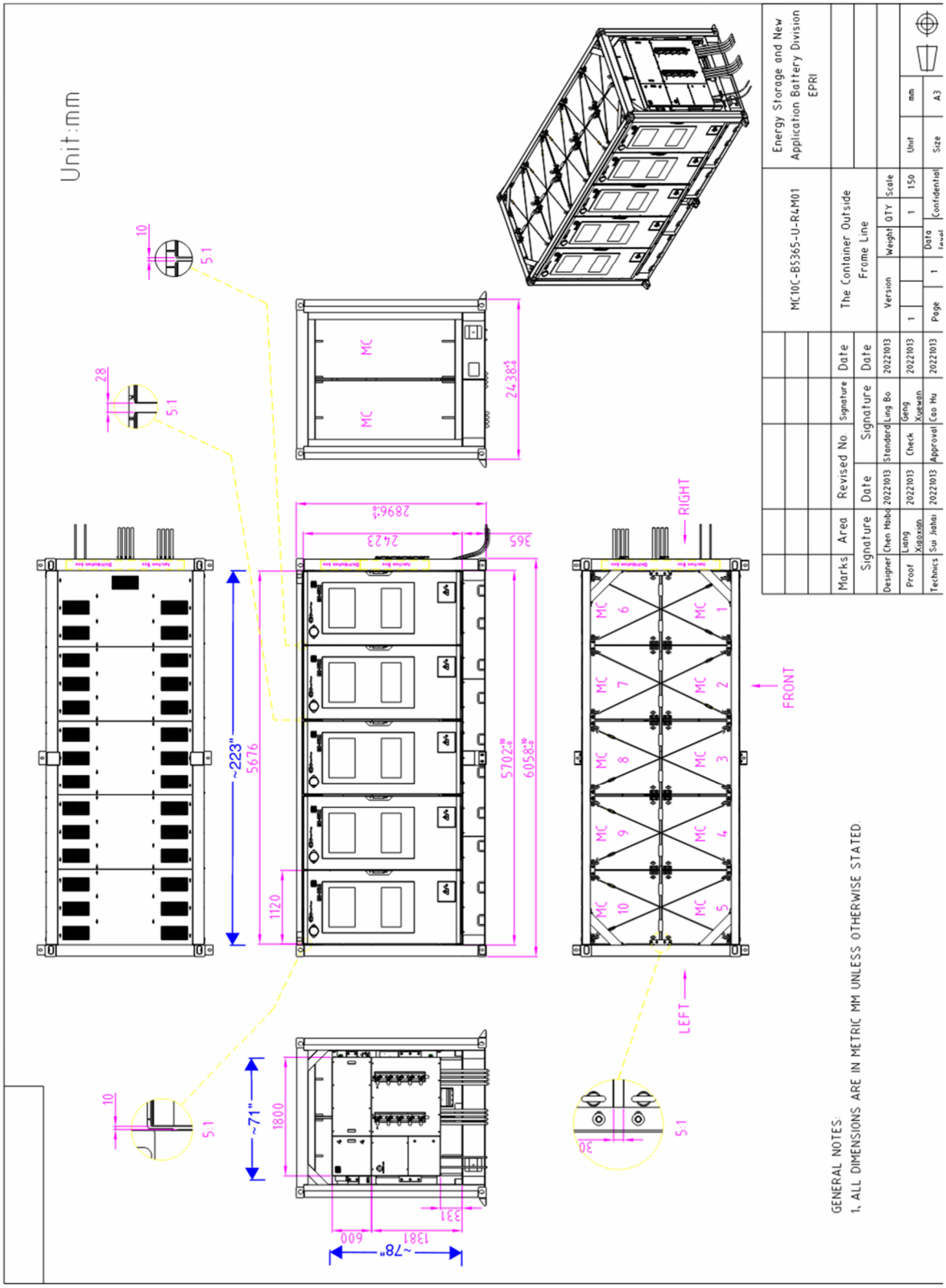
- *Image: Photo Taken Inside of our Existing Chula Vista Facility*

(Site Specific Plans Provided Via Separate Document)



Standard BESS Container Spec Sheet

EnerSmart™

Project Overview:

- **Capacity**: 9 MW/ 60MWh capacity (BESS 1) & 12 MW/80 MWh (BESS 2)
- **Battery Technology**: Lithium Iron Phosphate
- **Location**: 1474 Franklin Ave (BESS 1) & 1158 East End Ave (BESS 2) Pomona, CA
- **Size**: BESS 1: Total disturbed area = 0.84 Acres & BESS 2 Total Disturbed = 1.05 Acres
- **Current Zoning**: LM4-G2-I3 & LM4-G2-I2
- **Council District**: 3
- **Grid Interconnection**: Francis Substation
- **Construction**: Start: Q1 2027 – End: Q4 2027
- **Expected Operation**: Q4 2027

Why Pomona?

Opportunity, Pomona's Energy Needs: The LA Basin faces Significant RA shortfalls (per CPUC 2025 filings). Our BESS provides 21 MW dispatchable capacity, directly supporting 10,000+ households.
Clear Transmission Viability: No deliverability constraints. Sites offer integration without large transmission upgrades, based on our research and CAISO assessments.
Substation Proximity: Sites are near the Francis Substation, enabling direct interconnection.
Industrial Siting Away from Residential: Parcels are in established industrial areas, buffered from homes. Underutilized parcel due to odd shape and existing encumbrances.

Alignment with Pomona Zoning and Development Code

Proposed Similarity and Function: A Similar Use to Public Utility/Substation (PZDC Sec. 530.2)

Criteria	Support
Functional Similarity to Public Utility/Substation *How does BESS support grid services like a substation?*	BESS stores and distributes electrical energy to the grid, Just like a substation functions as form of power management. BESS Integrates with grid for load balancing, similar to voltage regulation thats control the flow of electricity within a power grid.
Impact on Adjacent Lots *Are BESS impacts on nearby lots equal to or less than a substation's?*	Minimal noise, screened fencing for visual mitigation, minimal traffic (2-3 maintenance visits/month). Impacts align with or are less than typical substation effects, fitting industrial zone standards. No additional strain on City Sewer and water infrastructure.
On-Site Staff Equivalence *Is BESS staffing minimal like a substation?*	Generally unmanned operation with remote monitoring, like most substations. Occasional maintenance staff (1-2 personnel) aligns with "often including on-site staff" for utility infrastructure.
Infrastructure Design and Components *Does BESS design match utility infrastructure components?*	Battery enclosures, inverters, and control systems resemble "control and transmission equipment" and "supporting on-site storage." Fenced compound matches substation layout in industrial zones.
Infrastructure Components *Does BESS design match utility infrastructure components?*	Involves on-site storage, control systems, transformers, and switchgear, directly paralleling "supporting on-site storage" for passive energy and "control and transmission equipment." Does not require domestic water or sewer line connections.
Safety and Regulatory Compliance *Are BESS safety measures comparable to a substation's?*	Complies with NFPA 855 and CPUC standards. SCE interconnection approved, ensuring safety equivalent to substation electrical safeguards.
Environmental and Site Management Features *Does BESS manage environmental impacts like utility infrastructure?*	No emissions during operation. On-site stormwater retention/water quality designed per city standards, similar to "storm water retention or detention ponds."

Economic and Public Benefit *Does BESS fit the zone's utility use character and scale?*	Enhances local energy reliability and sustainability, providing public services without fossil fuels, much like code-included clean energy infrastructure.
Public Benefit vs. Private Operation	PZDC defines utility infrastructure based solely on its function, services, and impacts on adjacent lots, without referencing ownership, operator type, or public versus private status.

Regional Alignment in CA

Criteria	Determination	Key Language
LA County	BESS most similar to Electric Distribution Substations (EDS).	"Energy storage devices shall be considered most similar to EDS" (due to conveyance of energy to users).
Santa Fe Springs	BESS similar to distribution substation.	"BESS is no more intense than other permitted uses in M-2 zone and is similar to a typical distribution substation."
San Bernardino County	BESS as "Utility Facility."	"BESS falls under Utility Facility, defined as a junction point for transferring electric utility services, including electrical substations."

Pomona's Own Existing Battery Storage Deployment

Pomona is already embracing BESS at smaller scales and utility-scale is a logical extension:

- **ACTS Grant (2024)**: $22M for batteries in 100+ homes, libraries, parks, and resilience centers to reduce blackouts and emissions. BESS scales this to grid level, providing 21 MW/140 MWh for city-wide resilience.
- **Power Choice Program (2024)**: $1.5M from Pomona Choice Energy/Tesla partnership; installs batteries in 1,000+ homes. BESS optimizes this by storing excess for peaks, turning home batteries into a community asset.

Conclusion

BESS is not just a functional match but categorically similar to "Public Utility Substation/Facility," as evidenced by the code's language, similar AHJ determinations, and Pomona's own battery deployments. Denying this DOS overlooks clear legal and operational parallels.

EnerSmart

FERC (Federal Energy Regulatory Commission)

Determination of our Chula Vista Project:

> On November 26, 2021, the Commission granted EnerSmart Chula Vista authority to make sales of energy and ancillary services at market-based rates, effective December 12, 2021.[19] Thus, as of December 12, 2021, approximately eight months before the Transaction, EnerSmart Chula Vista became a public utility subject to FERC jurisdiction under Sections 201 and 203 of the FPA.[20] On March 9, 2023, the Commission accepted a revised market-based rate tariff for EnerSmart Chula Vista that also provides for the sale of capacity.[21] EnerSmart Chula Vista has been designated as a Category 1 Seller in all regions.[22]

The above states that Enersmart Storage LLC is officially designated as a public utility under the Federal Power Act Sections 201 and 203, as confirmed by FERC authorization granted on November 26, 2021, for our Chula Vista BESS project, effective December 12, 2021, with a revised market-based rate tariff accepted on March 9, 2023. This designation stems from our engagement in interstate wholesale sales of energy, capacity, and ancillary services into CAISO markets, subjecting us to FERC jurisdiction (16 U.S.C. §§ 824, 824b) and aligning our operations with utility infrastructure functions outlined in Pomona Zoning & Development Code Sec. 530.E.3.

- **FERC Market-Based Rate (MBR) Authority**: Granted November 26, 2021, enabling wholesale sales, reinforcing our public utility status.
- **Category 1 Seller Designation**: Applied across all regions, indicating no market power concerns and full compliance with FERC oversight.

Our Pomona Facilities would follow suit.

EnerSmart

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