Notice of Exemption **Form D**

To: Office of Planning and Research
PO Box 3044
1400 Tenth Street, Room 113
Sacramento, CA 95812-3044

From: California Energy Commission
715 P Street
Sacramento, CA 95814

Project Applicant: Lawrence Berkeley National Laboratory

Project Title: California Campus Load Flexibility: CC-FLEX

Project Location:

Address	City	County
1801 Panorama Dr	Bakersfield 93305	Kern
5200 N Lake Rd	Merced 95343	Merced
9500 Gilman Dr	La Jolla 92093	San Diego

Description of Nature, Purpose and Beneficiaries of Project:
This project will develop CC-FLEX an open-source software solution to transform campuses into VPPs. CC-FLEX targets a chiller cooling plant and chilled water tank, a battery energy storage system (BESS), a fleet of EV charging stations, building thermostats served by the chiller plant, and combinations of these, (2) significant deployment efforts at UC Merced, UC San Diego, and Bakersfield College, demonstrating its cost-effectiveness and performance. LBNL is leveraging existing DER assets at these partners' sites so there will be no construction work involved in this project. Instead, LBNL will develop and deploy a software solution that integrates with existing DER assets via APIs and other interfaces.

Name of Public Agency Approving Project: California Energy Commission

Name of Person or Agency Carrying Out Project: Lawrence Berkeley National Laboratory

Exempt Status: (*check one)*

- ☐ Ministerial Exemption (Pub. Resources Code § 21080(b)(1); Cal. Code Regs., tit. 14, § 15268);
- ☐ Declared Emergency (Pub. Resources Code § 21080(b)(3); Cal. Code Regs., tit. 14, § 15269(a));
- ☐ Emergency Project (Pub. Resources Code § 21080(b)(4); Cal. Code Regs., tit. 14, § 15269(b)(c));
- ☒ Categorical Exemption. State type and section number

  Cal. Code Regs., tit. 14, § 15301 ; Cal. Code Regs., tit. 14, § 15303 ; Cal. Code Regs., tit. 14, § 15306
- ☐ Statutory Exemptions. State code number.
- ☐ Common Sense Exemption. (Cal. Code Regs., tit. 14, §15061(b)(3))

Reasons why project is exempt:

Cal. Code Regs., tit. 14, sect. 15301 provides that projects which consist of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, and which involve negligible or no expansion of existing or former use at the time of the lead agency's determination, are categorically exempt from the provisions of the California Environmental Quality Act (CEQA). The proposed project will consist of the integration and optimization of existing mechanical and electrical infrastructure such as chiller plants, thermal energy storage systems, battery energy storage systems, and EV charging stations. All activities are confined to the operation, repair, maintenance, and minor software-based alterations of these pre-existing systems, leveraging established Energy

Authority cited: Sections 21083 and 21110, Public Resources Code. Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Management System platforms and control networks. The project does not propose new construction or physical expansion, and all modifications are designed to preserve existing use patterns while enhancing operational efficiency and load flexibility. Therefore, the project falls within section 15301 and will not have a significant effect on the environment.

Cal. Code Regs., tit. 14, sec. 15303 provides that projects which consist of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure, are categorically exempt from the provisions of CEQA. This project consists of installation of new sensors and measurement devices on existing mechanical and electrical equipment. These devices provide and enhance existing data without altering the underlying infrastructure. All sensor deployments are non-invasive and leverage pre-installed systems such as chillers, TES units, and BESS assets to support the proposed VPP software solution. Therefore, the project falls within section 15303 and will not have a significant effect on the environment.

Cal. Code Regs, tit. 14, sec. 15306 provides that projects which consist of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource are categorically exempt from the provisions of CEQA. This project involves basic data collection and monitoring activities to evaluate infrastructure performance under varying operational scenarios. Research and experimental management efforts focus on testing software-driven control strategies and assessing their impact on energy flexibility. The project includes analyzing thermal and electrical storage utilization, load shifting potential, and system responsiveness to grid signals. For these reasons, the proposed project will have no significant effect on the environment and is categorically exempt under CEQA under section 15306.

This project does not involve impacts on any particularly sensitive environment; will not impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies; any cumulative impacts of successive projects of the same type in the same place that might be considered significant; does not involve unusual circumstances that might have a significant effect on the environment; will not result in damage to scenic resources within a highway officially designated as a state scenic highway; the project sites are not included on any list compiled pursuant to Government Code section 65962.5, and the project will not cause a substantial adverse change in the significance of a historical resource. Therefore, none of the exceptions to categorical exemptions listed in CEQA Guidelines section 15300.2 apply to this project and this project will not have a significant effect on the environment.

Public Agency
Contact Person: **Christian Fredericks** **Area code/Telephone/Ext:** 916-776-0755

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☐ Yes ☐ No

Signature: Christian Fredericks **Date:** 10/10/2025 **Title:** Mechanical Engineer

☒ **Signed by Public Agency**

☐ **Signed by Applicant** **Date received for filing at OPR:** _____

Authority cited: Sections 21083 and 21110, Public Resources Code. Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.