

DOCKETED

Docket Number:	24-SPPE-01
Project Title:	AVAIO Pittsburg Backup Generating Facility
TN #:	267036
Document Title:	IBEW LU 302 Comments - AVAIO Pittsburg
Description:	N/A
Filer:	System
Organization:	IBEW LU 302
Submitter Role:	Public
Submission Date:	11/6/2025 10:05:28 AM
Docketed Date:	11/6/2025

Comment Received From: IBEW LU 302
Submitted On: 11/6/2025
Docket Number: 24-SPPE-01

AVAIO Pittsburg

Letter attached

Additional submitted attachment is included below.

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

REGULAR MEETING 4TH WEDS. EACH MONTH



EXECUTIVE BOARD MEETS 3RD WEDS. EACH MONTH

1875 ARNOLD DRIVE • MARTINEZ, CALIFORNIA 94553-4239
TELEPHONE (925) 228-2302 • FAX (925) 228-0764

November 5, 2025

Ali Jahani, Project Manager
California Energy Commission
715 P Street
Sacramento, CA 95814
Email: STEPsiting@energy.ca.gov

Via Online Portal

[California Energy Commission : e-comment : Submit Comment](#)

Dear Ms. Jahani:

Thank you for the opportunity to comment on the AVAIO Pittsburg Generating Facility (PBGF) and Pittsburg Data Hub (PDH), Docket # 24-SPPE-01. On behalf of IBEW Local 302, I am pleased to write a letter of support for the staff recommendation to adopt a Mitigated Negative Declaration (MND), and we urge the California Energy Commission (CEC) to do all that it can to expedite approval of this worthwhile project.

The applicant (AVAIO) is proposing to construct and operate the AVAIO Pittsburg Backup Generating Facility to provide emergency backup power to the proposed Pittsburg Data Hub. Collectively, the PBGF and the PDH comprise the "Project." The CEC is responsible for reviewing with the power to approve all thermal electric power plants, 50 megawatts (MW) and greater, proposed for construction in the state. The Small Power Plant Exemption (SPPE) process allows applicants like AVAIO with generating facilities between 50 and 100 MW to obtain an exemption from the CEC's jurisdiction and proceed with local approval rather than requiring certification by the CEC. AVAIO filed an application on February 29, 2024 requesting an SPPE as its facility would not create a substantial adverse impact on the environment or energy resources.

Pursuant to the California Environmental Quality Act (CEQA), the CEC prepared an independent review to identify environmental effects resulting from the Project and to evaluate the significance of these effects. Based on the revised project description and associated submittals, data requests and responses, and additional staff research, it showed that there is no substantial evidence that the construction and operation of the "Project" would have a significant effect on the environment. All project-related environmental impacts were shown that they could be reduced to a less than significant level with the incorporation of feasible mitigation measures, and therefore the adoption of an MND would satisfy the requirements of CEQA.

The City of Pittsburg has done its own review and analysis and is in support of the "Project" as well. As a city with an industrial heritage that dates back more than a century to form the economic base of the community, they believe this Project represents a continued transition to new industrial uses that will serve the community for the next 100 years. It is a critical economic development project for a community that continues to make strides in providing more opportunities for its residents.

The "Project" will provide good union jobs, will hire trained local construction workers, maintain area wage standards, and provide health insurance. These benefits will not only be enjoyed by the City of Pittsburg but will benefit all of Contra Costa County. In addition, the "Project" will provide job training opportunities for the youth of the region for careers in the construction industry through the hiring of apprentices, along with financial support for joint labor-management apprentice training programs.

In closing, given that there are not any demonstrated negative environmental issues combined with the numerous benefits, IBEW Local 302 is pleased to support this Project and urges approval without further delay.

Sincerely,



Julian J. Vinatieri
Business Manager
Financial Secretary

JJV:np
opeiu 29:afl-cio