

DOCKETED	
Docket Number:	24-SPPE-01
Project Title:	AVAIO Pittsburg Backup Generating Facility
TN #:	267066
Document Title:	Letter of Support from SHEET METAL WORKERS' LOCAL UNION NO 104
Description:	Letter of Support AVAIO on behalf of SHEET METAL WORKERS' LOCAL UNION NO. 104
Filer:	Ali Jahani
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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Rick Werner
PRESIDENT/BUSINESS MANAGER

November 6, 2025

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

Dear Ms. Jahani:

On behalf of Sheet Metal Workers' Local Union No. 104, I wish to thank you for the opportunity to comment on the AVAIO Pittsburg Generating Facility (PBGF) and Pittsburg Data Hub (PDH), Docket# 24-SPPE-01 and am incredibly pleased to write a letter of support for the staff recommendation to adopt a Mitigated Negative Declaration (MND). We appeal to 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, which will 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 CBC. 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, there is no substantial evidence to show that the construction and operation of the Project would significantly impact the environment. Rather, 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.

After completing its own review and analysis, the City of Pittsburg is also in support of the Project. This is a key economic development project for a community that continues progressing in providing its residents with opportunities that will offer 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 the entire county of Contra Costa. In addition, the Project will provide the region's youth with valuable job training opportunities in the construction industry through the hiring of apprentices, along with financial support for joint labor-management apprentice training programs.

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Therefore, as no negative environmental issues have been established and there are myriad benefits, SMW Local Union No. 104 is in full support of the Project and respectfully requests immediate approval.

Sincerely,

A handwritten signature in blue ink, appearing to read 'RW', with a long horizontal stroke extending to the right.

Rick Werner
President/Business Manager

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