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Regional Infrastructure & Grid Reliability Concerns Re Proposed RB Inyokern Data Center

I respectfully submit this comment regarding the proposed RB Inyokern Data Center and the broader regional infrastructure concerns now emerging across the western United States as AI-related electrical demand accelerates.

Recent events involving NV Energy and Liberty Utilities servicing the Lake Tahoe region should serve as an important warning signal for California policy makers and regulators.

Public reporting indicates that Liberty Utilities was informed that a long-standing power arrangement serving tens of thousands of Tahoe area residents on the California side, would not continue beyond 2027. While utilities dispute the extent to which AI data center growth is responsible, the situation nevertheless illustrates a larger reality: rapidly expanding hyperscale, and AI infrastructure is beginning to reshape Western transmission planning, utility priorities, and long-term grid reliability assumptions.

This matters directly to the proposed RB data center because the project already proposes substantial electrical infrastructure, including dual 115kV transmission feeds, major substation development, and up to 99MW of diesel backup generation. At the same time, the larger regional, Ivanpah-Control transmission project remains under environmental review and has not yet received final approval to my knowledge.

This commission should carefully evaluate whether California is beginning to build interconnected infrastructure expectations before long-term transmission certainty, cumulative impact analysis, and public-cost accountability are fully understood.

The key issue is not whether technology should advance. The key issue is whether rural communities and California ratepayers are being asked to absorb long-term infrastructure, transmission, water, and environmental risks without sufficient lifecycle analysis of cumulative impacts.

Communities across the country are increasingly raising concerns regarding:

- Transmission strain, and reliability risks;
- Residential electricity-rate exposure;
- Water and energy interdependence;
- Diesel backup generation impacts;
- Infrastructure cost allocation.
- And, whether projected tax revenue is being treated as equivalent to net public benefit before full long-term costs are understood.

The Lake Tahoe situation demonstrates that these pressures are no longer theoretical.

We need to pay attention to what other communities are learning and learn from them before we make commitments that are unsustainable for our own communities.

I respectfully request that the commission ensure that the RB data center review includes a rigorous evaluation of:

• Cumulative Regional transmission impacts;

• Dependency assumptions tied to future infrastructure expansion projects such as Ivanpah-Control;

- Long-term ratepayer in public infrastructure exposure;

• Realistic, lifecycle energy and water demands;

- Diesel backup operational impacts;

• and, whether the current SPPE review pathway provides sufficient transparency and cumulative environmental analysis compared to a full CEQA review.

California has an opportunity to study emerging national examples BEFORE repeating preventable mistakes.

Revenue projections alone should not substitute for comprehensive lifecycle analysis. Revenue is not the same as net public benefit.

Thank you.