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Inyokern Data Center

I respectfully request that the California Energy Commission place an immediate moratorium on further advancement of the proposed RB Inyokern Data Center application until the applicant provides substantially more complete, independently verifiable technical disclosure regarding the projectâ€™s cooling-systems, realistic long-term water demand, atmospheric modeling assumptions, and cumulative expansion impacts.

Because of unresolved technical and environmental concerns within the current public record, I respectfully request:
1) An immediate moratorium on further advancement of the project review until these issues are independently clarified and publicly vetted.
2) Full disclosure of all atmospheric and thermal assumptions used to derive projected water consumption estimates.
3) Independent verification of cooling-system performance under Indian Wells Valley summer conditions.
4) Expanded cumulative impact analysis, addressing future expansion phases and climate-warming scenarios.
5) A full CEQA review before irreversible infrastructure or permitting momentum proceeds.

The current public record appears insufficient for meaningful public evaluation of the projectâ€™s true long-term impacts on water resources, infrastructure, and regional sustainability.

At issue is not merely the existence of a cooling system, but whether the projectâ€™s publicly stated water-use projections accurately reflect real operational conditions in the Indian Wells Valley under prolonged extreme desert heat.

The application currently appears vague or incomplete regarding several critical engineering and environmental assumptions that materially affect cooling-system performance and evaporative water demand, including:
â€“ Peak, dry bulb, temperature assumptions
- Wet bulb, temperature assumptions
- Humidity assumptions
- Duration of prolonged heat events
- Nighttime thermal recovery conditions.
- Future climate warming scenarios.
- Efficiency degradation during sustained high temperature operation.
- Water demand escalation during extended heat waves.

These omissions are significant because hybrid and closed-looped cooling systems remain highly dependent upon surrounding atmospheric conditions. Their operational efficiency can materially decline during prolonged extreme heat events â€“ especially when nighttime temperatures remain elevated and systems lose the ability to sufficiently recover thermally.

This concern is especially relevant in the Indian Wells Valley, where summer temperatures have repeatedly exceeded 110Â°F in recent years and nighttime temperatures during heat events often remain in the upper 70s and 80s.

Those are not hypothetical future conditions. They are recurring present-day desert realities.

My friend, who holds a Masterâ€™s Degree in Electrical Engineering with an emphasis in statistical signal processing, reviewed the publicly available information with me. One major concern from an engineering-analysis perspective is that the application appears to present outcome estimates without fully disclosing the underlying environmental variables, modeling assumptions, sensitivity ranges, and stress-condition scenarios used to produce those estimates.

In complex, high-thermal-load systems, assumptions and boundary conditions materially affect projected outcomes. Without transparent disclosure of those assumptions and stress-testing under prolonged desert heat conditions, the public cannot meaningfully evaluate whether the projectâ€™s projected water usage reflects realistic operational performance in the Indian Wells Valley.

Additionally, the application materials appear insufficient regarding cumulative future expansion impacts, including discussion surrounding a potential second unit and broader phase development. Water demand and infrastructure impacts should NOT be evaluated solely as a single isolated, first-phase facility if future expansion is reasonably foreseeable, which it is, because that is part of the developerâ€™s application package.

This is particularly important in a groundwater-stressed basin already facing overdraft concerns, imported water discussions, adjudication pressures, and long-term sustainability challenges.

Projections of this scale should not move forward based upon incomplete technical disclosure or optimistic, operational assumptions that may materially underestimate long-term resource impact in a desert basin already under stress.

Thank you for your consideration and for maintaining an public review process regarding this proposed project.