

DOCKETED

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Moratorium requested cumulative energy “ system analysis needed before further advancement of the RB Inyokern Data Center

I respectfully request that the California energy commission pause further advancement of the RB Inyokern Data Center application until a more comprehensive cumulative energy “ system analysis is completed and independently evaluated.

My concern is not limited to the proposed project in isolation. Rather, it involves the broader convergence of multiple statewide infrastructure pressures now occurring simultaneously across California’s energy system, including accelerating AI/data center demand growth, transmission expansion, planning, reliability concerns, wildfire-hardening expenditures, electrification demands, and increasing long-term stress on both electrical and water infrastructure systems.

The California Energy Commission’s mission includes long-range energy planning, infrastructure forecasting, reliability considerations, environmental stewardship, and evaluation of cumulative impacts associated with major energy related projects. In that context, I respectfully believe deeper cumulative analysis is warranted before irreversible permitting and infrastructure momentum proceeds.

Recent statewide, discussions involving AI-related electrical demand growth, transmission reliability, and large-scale infrastructure expansion demonstrate that California’s energy landscape is rapidly evolving. Publicly available utility and regulatory data also show substantial residential electricity-cost escalation occurring during the same period of expanding infrastructure complexity and grid modernization.

For example example:

“ Southern California Edison residential average rates have risen dramatically over the past decade, with publicly reported average residential rates reaching approximately \$.35 per kilowatt hour in 2025.

- Public record reporting and regulatory filings increasingly connect future AI/data center growth with statewide transmission planning, reliability concerns, and long-horizon infrastructure expansion needs.

- The Ivanpah related reliability and transmission context remains part of a broader evolving statewide energy planning environment rather than a fully static or permanently settled condition.

For these reasons, I respectfully request that the Commission require additional cumulative review and analysis addressing the following questions before further advancement occurs:

1) What long-term statewide electrical demand assumptions are being used regarding future AI/data center expansion across California and the Mojave desert region?

- 2) How are future transmission, reliability, and infrastructure expansion scenarios being incorporated into long-term operational assumptions for this project?
- 3) Have cumulative energy-system stresses been evaluated in conjunction with projected cooling system, performance, prolonged extreme heat conditions, and long-term water use assumptions?
- 4) What sensitivity analysis have been performed regarding future grid constraints, transmission delays, electrical cost escalation, or evolving statewide reliability conditions?
- 5) Has sufficient cumulative analysis been conducted regarding the long-term interaction between large-scale AI/data center development, public utility infrastructure expansion, ratepayer exposure, and rural community sustainability?

This request is for deeper transparency, cumulative systems analysis, and prudent long-term stewardship before major irreversible infrastructure commitments proceed within a fragile desert region, already facing substantial environmental and infrastructure pressures.

California is entering a period of historic energy-system transition. For that reason, cumulative impacts associated with very large industrial electrical loads deserve especially rigorous analysis before advancement proceeds further.

Thank you for your consideration and for your continued public service.
Kelli Cutts