

DOCKETED

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October 6, 2026

GIC San Jose, LLC
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

RE: Data Requests Set 4 for NorthTown Backup Generating Facility (25-SPPE-02)

Dear Mr. Galati:

Pursuant to Title 14, California Code of Regulations, Section 15084(b) and Title 20, California Code of Regulations, section 1941, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 4, which is necessary for the staff analysis of the NorthTown Backup Generating Facility (NTBGF), under the California Environmental Quality Act (CEQA).

These follow-up requests seek further information in **Alternatives** based on the contents of the application submitted thus far. CEC staff may submit subsequent data requests in this, and other resource areas based on further information received or as necessary for a complete analysis of the proposed project.

To assist CEC staff in completing its environmental review timely and to meet the requirements of CEQA pursuant to Title 14, California Code of Regulations, sections 15108 and 15109; staff are requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please send written notice to me within 10 days of receipt of this letter.

If you have any questions, please email me at Elizabeth.Huber@energy.ca.gov.

Elizabeth Huber
Project Manager

Enclosure: Data Requests Set 4

NORTHTOWN BACKUP GENERATING FACILITY DATA REQUESTS SET 4

ALTERNATIVES

Authors: Negar Vahidi, Irene Kaufman

BACKGROUND: Alternative Site Locations and Reduced Capacity Alternative

Per California Code of Regulations (CCR), Title 20, Division 2, Chapter 5, Appendix B (f) (1), an application must include "...[a] discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project..."

Further CCR Title 20, Appendix B (f) (1) requires that in accordance with Public Resources Code Section 25540.6(b), the application shall include a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.

In the SPPE Application (TN 264500) Section 8.1, the applicant provides project objectives for the entire NTDC as well as for the NTBGF specifically. Objectives for the NTBGF focus on reliability, commercial availability and feasibility, and technical feasibility. In application Section 8.1, the applicant states that as part of the preliminary planning and design of the project, alternatives to the proposed backup generators and a reduced alternative using a smaller capacity system were considered. Application Sections 8.2 and 8.3 discuss the reduced alternative and technology alternatives, respectively. However, the applicant does not provide any details of the reduced project's smaller capacity system, including information such as the number of generators or capacity, or consideration of a smaller NTDC as a whole. Further, the application does not discuss alternative project locations, including potential alternative locations for the whole NTDC.

During the scoping period, the City of San José requested that project description and impact analysis include the whole of the action, including but not limited to...Data center buildings and ultimate buildout..." (TN 272243). Staff also assumes that as part of the site selection process for the proposed data center itself, the applicant may have considered alternative locations to the proposed project site prior to site selection. CEC staff acknowledges that the backup generators need to be collocated with the NTDC. In addition, staff is requesting information on the alternatives being considered for the entire proposed NTDC, which would be analyzed for purposes of the City's CEQA clearance for the CUP application, including a potentially reduced project alternative (which includes the NTDC and the NTBGF). To help staff evaluate a reasonable range of alternatives, staff requests further information on alternative sites and a reduced project alternative.

NORTHTOWN BACKUP GENERATING FACILITY DATA REQUESTS SET 4

DATA REQUESTS

DR ALT-1 Please provide a discussion of any alternative sites considered for the NTDC and NTBGF and the reasons for dismissal.

DR ALT-2 Please provide a detailed description of the reduced capacity alternative (for the NTBGF) considered in the application, including number of generators, total generating capacity of the system in this alternative, and any other information regarding the alternative that could help inform staff's CEQA alternatives analysis. Please provide additional details (to what is provided in the application) on the specific reasons for dismissal of the reduced capacity alternative.