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Project Title:	McLaren Backup Generating Facility
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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of McLaren Backup Generating Facility	Docket Number 17-SPPE-01

MOTION OF HELPING HAND TOOLS TO DISMISS THE PROCEEDING

The Project does not qualify for SPPE Treatment

As provided in PRC section 25541, "*The commission may exempt from this chapter thermal powerplants with a generating capacity of up to 100 megawatts and modifications to existing generating facilities that do not add capacity in excess of 100 megawatts, if the commission finds that no substantial adverse impact on the environment or energy resources will result from the construction or operation of the proposed facility or from the modifications."* In order to qualify for the small power plant exemption a project must have a generating capacity less than 100 MW. The revised application proposes to utilize 47 Caterpillar Model 3516 E 2.75 MW diesel generators and also three-line generators rated at 600 kW. The gross rating of the 47 generators alone is 129.25 MW. There is no listed parasitic load so the 47 generators alone exceed the Commissions 100 MW limit for a SPPE application. The Energy Commission has previously determined the eligibility of multiple back up diesel generators in the Santa Clara Data Center SPPE. (DOCKET NO. 11-SPPE-01). As the Energy Commission Decision for the Santa Clara Data Center states, "*The current review by the Energy Commission considers the entire Data Center project, Phases 1 and 2, with the Phase 2 project as the trigger for analysis as it adds 16 additional backup generators, totaling 32 generators capable of 2.25 megawatts each, bringing total generation capacity of the backup system to 72 megawatts of installed*

capacity." [1] Further the Decision for the Santa Clara SPPE Phase 2 states, "*Each backup generator has a capacity to generate 2,250 kilowatts, or 2.25 megawatts (MW), a total capacity of 72 MW. Under state law, power plants that generate up to 100 MW may be exempted from the Energy Commission's licensing process if the Energy Commission determines a project proposal qualifies for such an exemption."* The McLaren data center with its 47 diesel generators rated at 2.75 MW and its three-line generators at 600kW total over 131 MW and does not qualify for SPPE treatment.[2]

The Commission determines the generating capacity of a project pursuant to § 2003 of the Commission 's of Practice and Procedure. (Generating Capacity). § 2003 provides that

(a) The "generating capacity" of an electric generating facility means the maximum gross rating of the plant's turbine generator(s), in megawatts ("MW"), minus the minimum auxiliary load.

(b) The "maximum gross rating" of the plant's turbine generator(s) shall be determined according to this subdivision. If there is more than one turbine generator, the maximum gross rating of all turbine generators shall be added together to determine the total maximum gross rating of the plant's turbine generator(s).

(1) The maximum gross rating of a steam turbine generator shall be the output, in MW, of the turbine generator at those steam conditions and at those extraction and induction conditions which yield the highest generating capacity on a continuous basis.

(2) The maximum gross rating of a combustion turbine generator shall be the output, in MW, of the turbine generator at average operating site conditions, with the proposed fuel type, and at those water or steam injection flow rates, which yield the highest generating capacity on a continuous basis.

(A) The average dry bulb temperature and relative humidity of the inlet air at the plant site shall be calculated using 10-year data for temperature and relative humidity from the nearest

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[1] **Small Power Plant Exemption SANTA CLARA SC-1 DATA CENTER, PHASE 2 Commission Decision Page 27 of 141** https://www.google.com/url?q=http://www.energy.ca.gov/2012publications/CEC-800-2012-002/CEC-800-2012-002-CMF.pdf&sa=U&ved=0ahUKEwiMnq2ywKTcAhUG3lQKHZEjBOQQFggMMAM&client=internal-uds-cse&cx=001779225245372747843:ctr4z8fr3aa&usg=AOvVaw3cmjqiAOs76hh84gqFoUDu

[2] The initial study states page 20 of 339, "All four systems share the approximate 3MW of mechanical load for a total load of 9MW. **Should any one system fail, the surviving systems will have enough capacity to completely share the 9MW of total load at the maximum capacity of the surviving generators**. During a utility outage, all four generators will start and be connected to their dedicated loads. If none of the generator systems fail during the utility outage, the total maximum load of 9MW will still be shared between the four generators, and will only be running at about 66% of the full capacity of the generator."

meteorological data point, using the most recent published data from the American Society of Heating, Refrigeration, and Air Conditioning Engineers (ASHRAE), the National Oceanographic and Atmospheric Administration (NOAA), the U.S. Air Force, or commercial airport weather stations.

(B) The barometric pressure at the site shall be one standard atmosphere, corrected for actual site elevation.

(3) The maximum gross rating cannot be limited by an operator's discretion to lower the output of the turbine generator(s) or by temporary design modifications that have no function other than to limit a turbine generator's output.

(4) The maximum gross ratings specified in the overall plant heat and mass balance calculations shall be subject to verification by commission review of the steam or combustion turbine generator manufacturer's performance guarantee, specifications and procurement contract, if available.

(c) The "minimum auxiliary load" means the electrical rating (in MW) of the sum of the minimum continuous and the average intermittent on-site electrical power requirements necessary to support the maximum gross rating as defined in subsection (b) of this regulation and which are supplied directly by the power plant. For geothermal projects, the minimum auxiliary load includes the minimum electrical operating requirements for the associated geothermal field which are necessary for and supplied directly by the power plant. Discretionary loads, i.e., those which can be curtailed without precluding power generation, are not included in minimum auxiliary loads.

Under the Commissions formula for determining the output of a project in Section 2003, or any other formula, the McLaren Data Canter does not qualify for SPPE treatment as its gross output is clearly over 100 MW. Accordingly, 2HT moves to dismiss the SPPE application.

Respectfully Submitted

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