

DOCKETED

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Project Title:	Laurelwood Data Center (MECP I Santa Clara I, LLC)
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Document Title:	Request for Agency Participation in the Review of the Laurelwood Data Center
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CALIFORNIA ENERGY COMMISSION

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**TO: AGENCY DISTRIBUTION LIST****REQUEST FOR AGENCY PARTICIPATION IN THE REVIEW OF THE LAURELWOOD DATA CENTER (19-SPPE-01)**

On March 5, 2019, MECP1 Santa Clara 1, LLC (applicant) filed an application with the California Energy Commission for a Small Power Plant Exemption (SPPE) for its Laurelwood Data Center (LDC) (19-SPPE-01). The applicant proposes to deploy backup diesel-fueled generators to serve the total data center load of up to 99 megawatts (MW) with an uninterruptible power supply for its tenants' servers. The data center is planned for construction at 2201 Laurelwood Road in Santa Clara, California.

PROJECT DESCRIPTION

The Laurelwood Data Center (LDC) would consist of two four-story buildings, with 56 3-MW diesel-fired backup generators, and a maximum 99-MW load of information technology, cooling, and ancillary equipment. Both buildings would include loading docks, backup generator yards, and stormwater bio-swales. The LDC would also include an onsite 60-kilovolt (kV) substation with an electrical supply line that will connect to a Silicon Valley Power (SVP) distribution line located 0.1 miles west of the project site. The generators would be distributed in redundant configurations (5 to make 4) to ensure uninterrupted power up to 99 MW, which is the maximum building load of the LDC. Each generator would have an approximately 10,300-gallon diesel fuel tank located underneath, to provide sufficient fuel storage to operate the generator at steady state continuous load for at least 48 hours. Each building's standby generators would be supported by an uninterruptible power supply (UPS) system consisting of batteries, an inverter, and switches to facilitate the uninterrupted transfer of electrical power from the SVP substation to the onsite standby generators in the event of a utility or equipment failure. The approximately 29,000-square-foot substation would be located in the southwest corner of the project site, with an approximately 600-foot-long electrical supply line that would head west from the substation to tie into SVP's existing 60-kV distribution line. Additional project features include electrical switchgear and distribution lines between the substation and buildings as well as from the backup generator yards and each respective building.

The California Environmental Quality Act (CEQA) requires the lead agency to consider the whole of the action. Therefore, the Energy Commission will include the entire data center project in its analysis, which includes the construction of two new four-story data center buildings and the substation, along with the installation and operation of the generators.

ENERGY COMMISSION'S SMALL POWER PLANT EXEMPTION PROCESS

The Energy Commission is responsible for reviewing, and ultimately approving or denying, all thermal electric power plants, 50 MW and greater, proposed for construction in California. The SPPE process allows applicants with projects between 50 and 100 MW to obtain an exemption from the Energy Commission's jurisdiction and proceed with local approval rather than requiring an Energy Commission license. The Energy Commission can grant an exemption if it finds that the proposed project would not create a substantial adverse impact on the environment or energy resources. In reviewing an SPPE application the Energy Commission acts as the lead agency under section 25519(c) of the Public Resources Code and CEQA and will perform any

required environmental analysis. As lead agency, the Energy Commission is required by Public Resources Code section 21080.3 and CEQA Guidelines section 15063(g) to consult with responsible agencies regarding significant environmental effects which could result from the project.

Energy Commission staff has begun its review of the application and will request the appointment of a Committee of two Commissioners at an upcoming Business Meeting to oversee the SPPE proceeding. Over the coming months, staff will evaluate the project and prepare an environmental analysis document—for SPPE projects this typically takes the form of an Initial Study. Following publication of that document and consideration of public comments, the assigned Committee will conduct a hearing to determine whether the proposed project should be exempted from the Energy Commission's power plant licensing requirements. This hearing will provide the public as well as local, state, and federal agencies the opportunity to ask questions about, and provide input on, the exemption request. If the exemption is granted, the applicant would still need to secure the appropriate licenses and permits from relevant local, state, and federal agencies.

PROJECT WEBPAGE AND LISTSERVE

The Energy Commission maintains a website for this project at: <https://www.energy.ca.gov/sitingcases/laurelwood/>. The SPPE application and related project documents are viewable by clicking the "Documents for this Proceeding (Docket Log)" link located near the upper right corner of the project webpage. The direct link to the project docket is: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=19-SPPE-01>.

To receive electronic notices of all project-related activities and documents related to the exemption evaluation, go to the Energy Commission's listserve web page (<http://www.energy.ca.gov/listservers>), and check the "laurelwood" box under "PROJECTS UNDER REVIEW."

AGENCY PARTICIPATION

Your agency's participation is encouraged and would consist of identifying and working to resolve issues of concern to your agency in connection with the SPPE proceeding. Pursuant to Title 20, California Code of Regulations, section 1936(d), we request any "analyses, comments, and recommendations" on the exemption application which you wish to provide. Again, please note that should the exemption be granted, the applicant would then be responsible for obtaining all necessary local, state, and federal permits required to construct and operate the project, which may entail additional analysis by relevant permitting authorities.

You may provide comments at any time, however, pursuant to Title 20, California Code of Regulations, section 1936(d), any written comments your agency may have must be filed with the Energy Commission prior to the conclusion of the evidentiary hearing, unless otherwise specified by law or by order of the presiding member. The date of this hearing is not yet known, but pursuant to Title 20, California Code of Regulations, section 1944(b) it should be held no later than June 13, 2019 unless otherwise directed by the presiding member. The Energy Commission will provide advance notice of the hearing via the listserve once it has been scheduled by the Hearing Office.

LAURELWOOD DATA CENTER (19-SPPE-01)
REQUEST FOR AGENCY PARTICIPATION

You may submit comments electronically. To use the Energy Commission's electronic commenting feature, go to the Energy Commission's webpage for this proceeding, cited above, click on the "Comment on this Proceeding" or "Submit e-Comment" link, and follow the instructions in the online form. Be sure to include the project name in your comments. Once submitted, you will receive an e-mail with a link to them after the Energy Commission Dockets Unit reviews to ensure the comments meet the requirements for submittal.

If you have any questions or need additional information on how to participate in the Energy Commission's review of the proposed project, please contact Leonidas Payne, Siting Project Manager, at (916) 651-0966, or by email to leonidas.payne@energy.ca.gov.

Sincerely,

3/14/19
Date: _____

Original Signed By:

Chris Davis
Siting Office Manager