

**DOCKETED**

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<b>Project Title:</b>	Laurelwood Data Center (MECP I Santa Clara I, LLC)
<b>TN #:</b>	228424-1
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**STATE OF CALIFORNIA**  
**Energy Resources Conservation**  
**and Development Commission**

In the Matter of:

LAURELWOOD DATA CENTER

Docket No. 19-SPPE-01

**SUPPLEMENT TO PETITION TO INTERVENE BY**  
**CALIFORNIA UNIONS FOR RELIABLE ENERGY**

May 30, 2019

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## **SUPPLEMENT TO PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY**

Pursuant to section 1211.7 of Title 20 of the California Code of Regulations, California Unions for Reliable Energy (“CURE”) submits this supplemental information in support of its May 21, 2019 petition to intervene in this proceeding. This supplemental information in support of CURE’s petition is submitted in response to Hearing Officer Susan Cochran’s May 29, 2019 request that CURE specify the topics on which CURE and its members would like to intervene.

CURE has participated in several permit proceedings for data center projects, including their backup power generation and other facilities, in the City of Santa Clara. In those cases, CURE identified informational deficiencies in the project descriptions that prevented adequate assessments of impacts on air quality and public health and from greenhouse gas emissions and energy use. CURE also identified underestimated, unanalyzed and unmitigated impacts from construction air emissions, operational air emissions, greenhouse gas emissions, energy use, hazards and noise. For those data center projects, CURE provided evidence showing that the data centers, including their backup power generation, may result in significant impacts on air quality and public health and from greenhouse gas emissions, energy use, hazards and noise. CURE also reviewed the water use associated with the data center projects. Finally, for these identified issues, CURE

proposed feasible mitigation measures to reduce impacts from data center projects to less than significant.

If granted intervention in this data center proceeding, CURE would like to participate in the topics of air quality, public health, greenhouse gas emissions, noise, hazards and hazardous material, energy and energy resources, and water resources. Due to the number of data centers being proposed in the City of Santa Clara, CURE would also like to participate in cumulative impacts associated with these resource areas. CURE respectfully reserves the right to participate in other topics should issues be identified warranting such participation. CURE may provide testimony, briefing, and cross-examination of witnesses.

For the reasons set forth in CURE's May 21, 2019 petition to intervene, as supplemented herein, CURE respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow CURE to participate as a party.

Dated: May 30, 2019

Respectfully submitted,



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