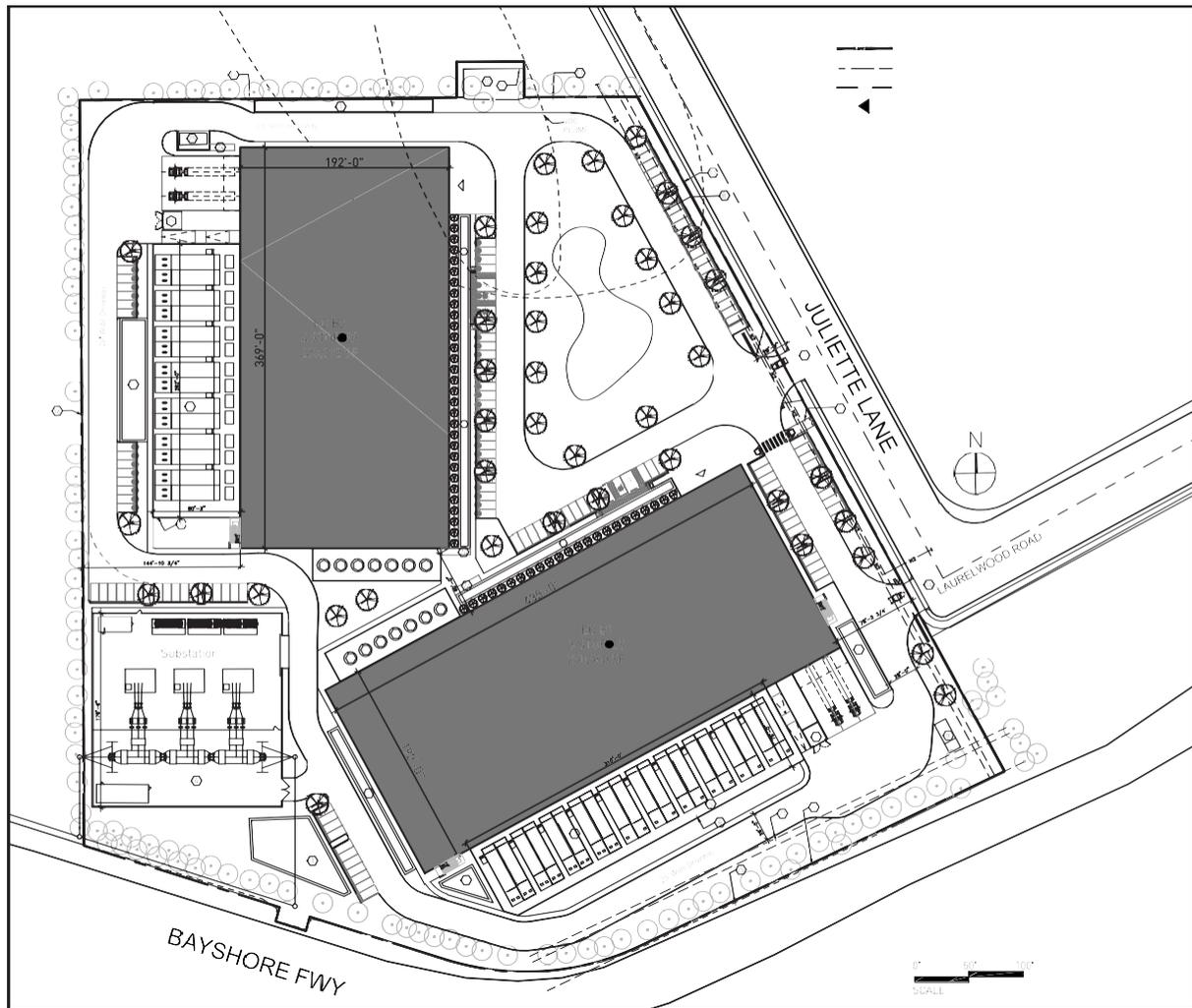


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LAURELWOOD DATA CENTER SPPE

Final Commission Decision



CALIFORNIA
ENERGY COMMISSION
Gavin Newsom, Governor

FEBRUARY 2020
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sufficient in itself to support a finding unless it would be admissible over objection in civil actions.¹²² Because no other admissible evidence to support Intervenor Sarvey's position has been presented, the hearsay statements from Mr. Stone cannot be used to support a finding under the Warren-Alquist Act that the Project may have an adverse environmental impact.

In determining the number of hours to be used to analyze emergency operations, Staff reviewed the historical outages experienced by data centers in SVP's territory. The undisputed evidence indicates that between December 6, 2012, and August 2, 2019, there were a total of 31 outages to SVP's 60 kV lines that provide electrical power to the 12 kV distribution system that feeds power to data centers and other customers. Of those 31 outages, data centers were affected by only two of the events, with the longest interruption lasting for approximately 7.5 hours.¹²³

As a challenge to the historical data of the reliability of SVP, Intervenor Sarvey contends that an outage on the SVP northwest loop could impact as many as 10 data centers and an unknown number of diesel generators.¹²⁴

The evidence establishes that, to date, none of the interruptions to the electrical supply have affected all customers--or even all data centers--on a loop.¹²⁵ In the two incidents described above, only two data centers were affected in one outage; four data centers were affected in the second outage.¹²⁶ In addition, after every interruption of the electrical supply, SVP reviews the root causes of the interruption and designs subsequent facilities and/or procedures to prevent future similar events. For the northwest loop that would serve the Project, "SVP has designed the loops with breakers to limit a cascade event (e.g., an N-1-1 event)."¹²⁷ We thus find that an outage affecting all customers on a loop—sometimes referred to as a cascade event-- is unlikely.

As a further challenge to reliance on historic data on outages, Intervenor Sarvey argues that SVP would be subjected to power loss through Public Safety Power Shutoffs (PSPS) as a preventative measure by PG&E to reduce the potential for sparking and wildfire.¹²⁸

We recognize that outages caused by PSPS may be foreseeable. However, CEQA provides that if a lead agency finds that a particular impact is too speculative for

¹²² Cal. Code Regs., tit. 20, §1212(c)(3).

¹²³ Ex. 200, p. 5.3-28, App. B, pp. 4-5; 11/1/19 RT 102:25 – 103:11.

¹²⁴ Ex. 300, p. 7; 11/1/19 RT 106:8 – 106:24.

¹²⁵ Ex. 203, p. 7-9.

¹²⁶ Ex. 200, App. B, p. 8.

¹²⁷ *Id.* at p. 8 [noting that Ex. 200, Appendix B shows 11 data centers on the NW Loop that would supply the Data Center].

¹²⁸ Ex. 300, pp. 7-8.

evaluation, “the agency should note its conclusion and terminate discussion of the impact.”¹²⁹

Kevin Kolnowski, Electric Utility Chief Operating Officer at SVP, confirmed that SVP had not been affected to date by PSPS.¹³⁰ Mr. Kolnowski testified that SVP could potentially be impacted by PSPS in the future, as “dictated by the California Independent System Operator.”¹³¹ However, as stated by Brewster Birdsall, Staff’s air quality expert in testimony related to emergency operations in general, “An emergency operation is unplanned and infrequent, and it’s not possible to predict exactly how much operations will occur or for what duration.”¹³²

Here, SVP has, to date, not experienced any outages from PSPS. We have no evidence of the frequency, timing, and duration of PSPS outages and the impact that they may have on SVP. We therefore find that further analysis of PSPS outages is speculative and not required by CEQA.

Analysis of Other Data Centers

Intervenor Sarvey also argues that the analysis of emissions from emergency operations should have included an analysis of the impact from the emergency operations of backup generators at other data centers near the Project.¹³³

The IS/PMND described interruptions to electrical service as infrequent and of short duration.¹³⁴ In addition, Staff had no evidence that adding the Project to the electrical system would increase the likelihood of outages at other nearby data centers. Staff thus concluded that “quantification of the emissions or air quality impacts caused by other data centers in emergency situations in conjunction with the [Project] would require speculation”¹³⁵

We agree with Staff that attempting to quantify emissions or air quality impacts caused by other data centers is speculative because of the inability to determine how many data centers will actually be impacted, the number of generators that may be involved, and the emission profiles of these generators.¹³⁶ We therefore decline to perform this speculative analysis.

¹²⁹ See § 21168; Guidelines, § 15145.

¹³⁰ 11/1/19 RT 131:9 – 132:10.

¹³¹ 11/1/19 RT 132:5 – 132:7.

¹³² 11/1/19 RT 47:19 – 47:21.

¹³³ Ex. 300, pp. 5-8.

¹³⁴ Ex. 200, p. 5.3-26.

¹³⁵ Ex. 203, p. 8 [citing Ex. 200, pp. 5.3-26 to 5.3-29].

¹³⁶ See § 21168; Guidelines, § 15145.