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*Comment Received From: Enchanted Rock, LLC  
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## **Enchanted Rock Comments on Walsh Data Center Proposed Decision**

Enchanted Rock, LLC hereby respectfully submits limited comments to the Proposed Commission Adoption Order (â€œProposed Orderâ€œ) in Docket No. 19-SPPE-02, granting a Small Power Plant Exemption (â€œSPPEâ€œ) for the Walsh Backup Generating Facility (â€œProjectâ€œ)

Enchanted Rock provides clean resiliency microgrid solutions that can displace the use of diesel back-up generation in commercial, industrial, and utility-scale applications, including data center sites. Enchanted Rockâ€™s microgrid technology is CARB DER compliant and its constituent emissions are superior to diesel generation. Furthermore, using renewable natural gas (RNG), its resiliency microgrids are carbon dioxide negative (CO2e). Enchanted Rock operates 400MW of microgrids at 170 sites. Our microgrid technology has been independently tested for electrical performance and has proven to meet or exceed the performance standards of diesel back-up generator plants.

Enchanted Rockâ€™s technology is a lower cost alternative to diesel generation in California when combined with revenues derived from Resource Adequacy. Because non-emergency operations are typically for less than 250 hours per year, resulting annual constituent emissions would be lower than diesel back-up plants operating in test mode only.

Enchanted Rockâ€™s comments are limited to the following:

Condition of Exemption PD-2. Notice of Events Affecting Off-Site Distribution of Energy Generated by the Facility.

The granting of the Small Power Plant Exemption for the Walsh Backup Generating Facility is specifically conditioned on the power generated being used exclusively by the Walsh Data Center. At no time shall the owner of the Walsh Data Center allow the power to be generated by the Walsh Backup Generating Facility to be used for any other facility, property, or use, including, but not limited to, delivery to the electric distribution system without the express written approval of the CEC.

Enchanted Rock supports the Proposed Orderâ€™s restriction that the power generated be used â€œexclusively by the Walsh Data Center,â€œ since backup diesel emissions are substantial and should be minimized to emergency hours for serving local load at the Walsh Data Center, as well as for necessary testing. In addition, Enchanted Rock appreciates the clarification that the diesel backup plant operating limitation includes the â€œdelivery to the electric distribution system without the express written

approval of the CEC.â€

Enchanted Rock respectfully requests that the Commission modify the Proposed Order if the Project meets the following two conditions:

1. The applicant notifies the Commission of its plan to use a substitute backup technology that is CARB DER compliant, and
2. The substitute technology is limited to 250 non-emergency run-hours per year.

Specifically, Enchanted Rock respectfully requests that the Condition of Exemption PD-2 be modified to reflect that such a technology substitution would be allowed and the previously granted SPPE would remain valid if the above two conditions are satisfied. Under these conditions, no resubmittal of an SPPE application would be required.

Thank you for the opportunity to provide comments to the in Docket No. 19-SPPE-02.