

DOCKETED

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Comments on Docket No 19-SPPE-03, Sequoia Backup Generating Facility SPPE

Additional submitted attachment is included below.

November 13, 2020

California Energy Commission
Docket Unit
Docket Number: 19-SPPE-03
1516 Ninth Street, MS-14
Sacramento, California 95814

Re: Comments on Docket No. 19-SPPE-03, Sequoia Backup Generating Facility SPPE

Dear California Energy Commission:

The undersigned organizations respectfully submit the following written comment to the California Energy Commission (“Commission”) on the proposed Sequoia Data Center. This proposed project would consist of a four-story, 703,450-square foot data center building that will house computer servers. As proposed, the project would rely on 54 onsite Tier 2 backup diesel generators. In light of the increasingly common heat storm events and related power outages across California, our organizations ask the Commission to remand the proceedings back to the Committee to consider air quality and public health impacts of this project in light of the recent energy emergencies, and to require this project use clean generation technology that does not put public health and the climate at risk. We also ask the Commission to work with the California Air Resources Board (“CARB”), air districts, and community members before permitting backup generation for this and any other data center project. As California doubles down on its transition to zero-emissions, it is critical that the Commission take a step back and engage with community members and air quality experts before approving diesel power generation that may add up to hundreds of megawatts.

There is no reasonable justification to continue investing in outdated and highly polluting Tier 2 diesel backup generators when there are cleaner technologies available. California’s transition to zero-emissions power generation is underway, and it is critical that the Commission not permit fossil fuel infrastructure that will continue polluting communities for decades to come. This project and others like it should consider fuel cell and natural gas generators where the technology is available. Indeed, even Tier 4 diesel engines emit approximately 93% fewer NOx emissions compared to Tier 2 engines equipped with diesel particulate filters.¹ While backup generators are an insurance policy to ensure that data centers can continue functioning uninterrupted during a power outage, as the Commission notes, this does not mean that emissions from highly polluting emergency generators should be disregarded.

It is especially important that the Commission thoroughly evaluate pollution from these projects because, according to CalEnviroScreen, the Sequoia Data Center and many other data center projects are located in or near communities already experiencing elevated levels of

¹ See California Air Resources Board Comments on Air Quality Analysis, October 15, 2020 (TN# 235271), at 13.

environmental risk.² Emissions from these diesel backup generators, when averaged over months and years, may not be the largest contributors of air pollution in the region, but the Commission should not ignore that this pollution has significant costs to impacted communities located near these data centers. What's worse, heat storm events that trigger power outages have become annual events for Californians. These events and outages are not only devastating and dangerous in and of themselves, but they can also translate to periods of heightened pollution levels and poor air quality. The combination of running polluting peaker plants, increased smog from high temperatures, and widespread power outages creates a dangerous environment for Californians, and environmental justice communities in particular. Therefore, it is critical that the Commission account for the significant emissions these Tier 2 backup diesel generators would contribute to this toxic brew.

In sum, we urge the Commission to remand the proceedings to the Committee to evaluate the air quality and public health impacts of this proposed project in light of the recent energy emergencies. Given the air and climate crises facing California, the Commission should explore zero-emission options for backup generation, and ensure that any alternative solution reflects modern pollution control standards. Finally, we ask the Commission to engage with CARB, air districts, and community members as this and other similar projects move forward to find backup power solutions for data centers that are consistent with California's zero-emissions energy future and its commitment to protecting the health of vulnerable communities.

Sincerely,

Yasmine Agelidis
Associate Attorney
Earthjustice
Office: (213) 766-1074
yagelidis@earthjustice.org

Alison Seel
Associate Attorney
Sierra Club
Office: (415) 977-5737
alison.seel@sierraclub.org

Lauren Cullum
Policy Advocate
Sierra Club California
Office: (916) 557-1107
Cell: (757) 871-1643

² *Id.* at 2.