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Submitted On: 3/1/2021
Docket Number: 19-SPPE-04*

Comment Letter for San Jose Data Center NOP

Additional submitted attachment is included below.



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Bay Area Air District:



March 1, 2021

Lisa Worrall, Project Manager
Siting, Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

RE: San Jose Data Center – Notice of Preparation

Dear Ms. Worrall,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the San Jose Data Center (Project). The Project applicant, Microsoft Corporation, proposes to construct two single-story data center buildings on an approximately 64.5-acre site in San Jose. Although the maximum electrical load of the data center would be designed for 99 megawatts (MW), the estimated load is expected to be 92 MW. The Project would include 40 3.0-MW Tier 4 diesel-fired generators as well as an onsite 115-kilovolt (kV) substation with two 115-kV electrical supply lines connecting to Pacific Gas & Electric's (PG&E) Los Esteros Substation. As the lead agency, the California Energy Commission (CEC) can grant the project applicant a Small Power Plant Exemption if it finds that the proposed project would not create a substantial adverse impact on the environment or energy resources. The Project will require Air District approval of an Authority to Construct and Permit to Operate the backup diesel generators, and as such, the Project will be required to comply with all applicable Air District regulations.

The Air District has worked for many years to improve air quality and health in San Jose and continues to do so today. Because the Project is located in the Alviso neighborhood, a high cumulative exposure area identified through CalEPA's CalEnviroScreen mapping tool, the Air District is concerned about the potential for any increase in emissions that could result from the Project. In addition, Microsoft has announced that the company plans to become carbon negative by 2030, including elimination of dependency on diesel fuel. To achieve the most health protective air quality conditions and to reach climate goals, the Air District highly recommends the CEC consider requiring the Project applicant to use the cleanest available technologies and fuels possible during all phases of the Project, including zero-emission sources for energy and backup generation as well as the lowest-GWP refrigerants available for the cooling system.

Air District staff further recommends the EIR include the following information and analysis:

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- **The greenhouse gas (GHG) impact analysis should include an evaluation of the Project's consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State's 2030, 2045, and 2050 climate goals.** The current recommended GHG thresholds in the Air District's 2017 CEQA Guidelines are based on the State's 2020 GHG targets which are now superseded by the 2030 GHG targets established in SB 32. The EIR should demonstrate how the Project will be consistent with the Scoping Plan as well as the State's long-term climate goals. This includes an evaluation and discussion of how the GHG emissions associated with the electricity used by the data center and diesel fuel combusted by the backup power generators (including non-testing/non-maintenance operations) are consistent with the State's goal of carbon neutrality as soon as possible and no later than 2045.
 - **The EIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on sensitive receptors within and near the Project area.
 - **The EIR should include various scenarios of backup power generation operations beyond routine testing and maintenance.** Air District staff has reviewed recent data regarding backup generator usage during non-testing/non-maintenance operations at several Bay Area data centers. Between September 1, 2019, and September 30, 2020, nearly half of the identified data centers in Santa Clara, San Jose, and Sunnyvale operated backup diesel generators for reasons other than routine testing and maintenance. Many of the data centers operated diesel generators during multiple non-testing/non-maintenance events; non-testing/non-maintenance hours of operation approached 50 hours for one generator for one event; it appears 40 or more generators operated concurrently at two facilities; and one facility ran diesel generators for approximately 400 hours for non-testing/non-maintenance purposes during this time period. Please see Attachment 1 for details of the preliminary information on non-testing/non-maintenance operations that the Air District has received from data centers. These data indicate that such events are not uncommon, which demonstrates the need to evaluate these operations. Air District staff recommends that the EIR include GHG, criteria pollutant, and TAC impacts due to the non-testing/non-maintenance operations of backup power generators. Various scenarios should be considered for non-testing/non-maintenance operations, including non-zero hours of operation and concurrent generator operations.
 - **The EIR should evaluate all feasible measures, both onsite and offsite, to minimize air quality and GHG impacts.** The EIR should prioritize onsite measures, followed by offsite measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:

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- Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>) and the commitment by Mayor Sam Liccardo of the City of San Jose to meet this goal.
 - Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and/or fuel cells or solar PV backup power with battery storage capacity.
 - Joining San Jose Clean Energy's (SJCE) TotalGreen program and thus committing to the purchase of 100 percent renewable energy or negotiating an electricity contract with SJCE for 100 percent renewable energy.
 - Implementing best available industry energy efficiency practices to achieve a power usage effectiveness (PUE) rating of 1.2 or lower.
 - Using the lowest-GWP refrigerant available for the data center cooling system.
 - Requiring construction vehicles to operate with the highest tier engines commercially available.
 - Creating a construction phase traffic management plan that reduces diesel equipment idling.
 - Supporting zero-emission vehicles via provision of electric vehicle (EV) charging infrastructure and preferential parking for EVs.
 - Procuring high quality carbon offsets after implementation of all feasible onsite mitigation measures in order to eliminate remaining GHG emissions associated with construction and operation of the Project.
- **The EIR should include a robust alternatives analysis, with consistent application of analytical standards and substantiation of claims.** CEC staff should apply the same analytical standard to its alternatives analysis as it does elsewhere in the EIR. Specifically, if a probability risk assessment is used to justify the low likelihood of a grid outage and thus of diesel generator operations, then that same analytical framework should be applied in the assessment of alternatives (e.g., likelihood of a seismic event disrupting natural gas deliveries, likelihood of a diesel supply shortage resulting from a grid outage, etc.). In addition, the analysis should consider calculating and comparing the reliability of primary and backup system options (e.g., the grid as primary and diesel generators as backup as one configuration, compared to fuel cells as primary and the grid as backup). Lastly, the EIR should substantiate any claims or anecdotal evidence provided to CEC by citing third-party studies.
 - **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. The 2017 CAP can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

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- **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. If the Project requires a site-specific analysis, please contact Air District staff to obtain more recent data.
 - **Certain aspects of the Project will require a permit (Authority to Construct/Permit to Operate) from the Air District (for example, backup diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.

We encourage the CEC to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or jfong@baaqmd.gov, or Jakub Zielkiewicz, Advanced Projects Advisor, at (415) 749-8429 or jzielkiewicz@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

Attachment 1: Preliminary Back-Up Diesel Engine Operations (Non-Testing/Non-Maintenance)

cc: BAAQMD Chair Cindy Chavez
BAAQMD Director Margaret Abe-Koga
BAAQMD Director Rich Constantine
BAAQMD Director Rob Rennie
CARB Executive Officer Richard Corey

Attachment 1: Preliminary Back-Up Diesel Engine Operations (Non-Testing/Non-Maintenance)

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose								
September 1, 2019 - September 30, 2020								
Facility operator data, based on facility responses to BAAQMD's 9/25/20 data request and follow-up conversations. Data may be refined and additional information may be available during follow-up discussions.								
Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
1	1	Santa Clara	2	9	5%	90	8/17/20-8/18/20	State Emergency Load Shedding
1	2	Santa Clara	2	8.8	6%	240	8/17/20-8/18/20	State Emergency Load Shedding
1	2	Santa Clara	2	1.2	5%	29	8/17/20-8/18/20	Human error event
1	3	Santa Clara	2	1	1%	5	8/17/20-8/18/20	Human error event
1	4	Santa Clara	2	8.5	25%	390	8/17/20-8/18/20	State Emergency Load Shedding
1	4	Santa Clara	2	1	26%	58	8/17/20-8/18/20	Human error event
1	5	Santa Clara	2	9.1	31%	400	8/17/20-8/18/20	State Emergency Load Shedding
1	6	Santa Clara	2	8.9	21%	300	8/17/20-8/18/20	State Emergency Load Shedding
1	7	Santa Clara	2	8.8	24%	350	8/17/20-8/18/20	State Emergency Load Shedding
1	8	Santa Clara	2	8.8	25%	350	8/17/20-8/18/20	State Emergency Load Shedding
1	9	Santa Clara	2	8.6	22%	325	8/17/20-8/18/20	State Emergency Load Shedding
1	10	Santa Clara	2	9	19%	300	8/17/20-8/18/20	State Emergency Load Shedding
2	1	Sunnyvale	2	12.6	34%	682	Various	Utility inflicted disturbance
2	2	Sunnyvale	2	14.7	41%	795	Various	Utility inflicted disturbance
2	3	Sunnyvale	2	15.3	30%	828	Various	Utility inflicted disturbance
2	4	Sunnyvale	2	13.8	32%	747	Various	Utility inflicted disturbance
2	5	Sunnyvale	2	20.2	26%	1093	Various	Utility inflicted disturbance
3	1	Santa Clara	2	0.5	1%		8/17/20-8/18/20	State Emergency Load Shedding
3	2	Santa Clara	2	1.4	2%		8/17/20-8/18/20	State Emergency Load Shedding
3	3	Santa Clara	2	36.7	40%		8/17/20-8/18/20	State Emergency Load Shedding
3	4	Santa Clara	2.25	0.2	1%		8/17/20-8/18/20	State Emergency Load Shedding
3	5	Santa Clara	2.25	31.7	36%		8/17/20-8/18/20	State Emergency Load Shedding
3	6	Santa Clara	2.25	37.3	36%		8/17/20-8/18/20	State Emergency Load Shedding
4	1	Santa Clara	2.25	0.4	33%	25	8/16/2020	Lightning strikes to transmission line
4	2	Santa Clara	2.25	0.4	33%	25	8/16/2020	Lightning strikes to transmission line
4	3	Santa Clara	2.25	0.4	33%	25	8/16/2020	Lightning strikes to transmission line
4	4	Santa Clara	2.25	0.4	33%	25	8/16/2020	Lightning strikes to transmission line
4	5	Santa Clara	2.25	0.4	33%	25	8/16/2020	Lightning strikes to transmission line
4	6	Santa Clara	2.25	0.5	33%	32	8/16/2020	Lightning strikes to transmission line
4	7	Santa Clara	2.25	0.5	33%	32	8/16/2020	Lightning strikes to transmission line
4	8	Santa Clara	2.25	0.5	33%	32	8/16/2020	Lightning strikes to transmission line
4	9	Santa Clara	2.25	0.5	33%	32	8/16/2020	Lightning strikes to transmission line
4	10	Santa Clara	2.25	0.5	33%	32	8/16/2020	Lightning strikes to transmission line
4	11	Santa Clara	2.25	0.5	33%	32	8/16/2020	Lightning strikes to transmission line
4	12	Santa Clara	2.25	0.6	33%	38	8/16/2020	Lightning strikes to transmission line

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

September 1, 2019 - September 30, 2020

Facility operator data, based on facility responses to BAAQMD's 9/25/20 data request and follow-up conversations. Data may be refined and additional information may be available during follow-up discussions.

Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
4	13	Santa Clara	2.25	0.6	33%	38	8/16/2020	Lightning strikes to transmission line
4	14	Santa Clara	2.25	0.6	33%	38	8/16/2020	Lightning strikes to transmission line
4	15	Santa Clara	2.25	0.6	33%	38	8/16/2020	Lightning strikes to transmission line
4	16	Santa Clara	2.25	0.6	33%	38	8/16/2020	Lightning strikes to transmission line
4	17	Santa Clara	2.25	0.4	43%	33	8/16/2020	Lightning strikes to transmission line
4	18	Santa Clara	2.25	0.4	43%	33	8/16/2020	Lightning strikes to transmission line
4	19	Santa Clara	2.25	0.4	43%	33	8/16/2020	Lightning strikes to transmission line
4	20	Santa Clara	2.25	0.4	43%	33	8/16/2020	Lightning strikes to transmission line
4	21	Santa Clara	2.25	0.4	43%	33	8/16/2020	Lightning strikes to transmission line
4	22	Santa Clara	2.25	0.5	43%	41	8/16/2020	Lightning strikes to transmission line
4	23	Santa Clara	2.25	0.5	43%	41	8/16/2020	Lightning strikes to transmission line
4	24	Santa Clara	2.25	0.5	43%	41	8/16/2020	Lightning strikes to transmission line
4	25	Santa Clara	2.25	0.5	43%	41	8/16/2020	Lightning strikes to transmission line
4	26	Santa Clara	2.25	0.5	43%	41	8/16/2020	Lightning strikes to transmission line
4	27	Santa Clara	2.25	0.5	43%	41	8/16/2020	Lightning strikes to transmission line
4	28	Santa Clara	2.25	0.6	43%	49	8/16/2020	Lightning strikes to transmission line
4	29	Santa Clara	2.25	0.6	43%	49	8/16/2020	Lightning strikes to transmission line
4	30	Santa Clara	2.25	0.6	43%	49	8/16/2020	Lightning strikes to transmission line
4	31	Santa Clara	2.25	0.6	43%	49	8/16/2020	Lightning strikes to transmission line
4	32	Santa Clara	2.25	0.6	43%	49	8/16/2020	Lightning strikes to transmission line
4	33	Santa Clara	2.25	0.4	52%	34	8/16/2020	Lightning strikes to transmission line
4	34	Santa Clara	2.25	0.4	52%	34	8/16/2020	Lightning strikes to transmission line
4	35	Santa Clara	2.25	0.4	52%	34	8/16/2020	Lightning strikes to transmission line
4	36	Santa Clara	2.25	0.4	52%	34	8/16/2020	Lightning strikes to transmission line
4	37	Santa Clara	2.25	0.4	52%	34	8/16/2020	Lightning strikes to transmission line
4	38	Santa Clara	2.25	0.5	52%	43	8/16/2020	Lightning strikes to transmission line
4	39	Santa Clara	2.25	0.5	52%	43	8/16/2020	Lightning strikes to transmission line
4	40	Santa Clara	2.25	0.5	52%	43	8/16/2020	Lightning strikes to transmission line
4	41	Santa Clara	2.25	0.5	52%	43	8/16/2020	Lightning strikes to transmission line
4	42	Santa Clara	2.25	0.5	52%	43	8/16/2020	Lightning strikes to transmission line
4	43	Santa Clara	2.25	0.5	52%	43	8/16/2020	Lightning strikes to transmission line
4	44	Santa Clara	2.25	0.6	52%	51	8/16/2020	Lightning strikes to transmission line
5	1	Santa Clara	2	5	46%	325	8/17/20-8/18/20	State Emergency Load Shedding
5	2	Santa Clara	2	6	58%	400	8/17/20-8/18/20	State Emergency Load Shedding
6	1	Santa Clara	2	41.9	30%	200	8/17/20-8/18/20	utility outage

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

September 1, 2019 - September 30, 2020

Facility operator data, based on facility responses to BAAQMD's 9/25/20 data request and follow-up conversations. Data may be refined and additional information may be available during follow-up discussions.

Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
6	2	Santa Clara	2	47.7	22%	180	8/17/20-8/18/20	utility outage
6	3	Santa Clara	2	13	2%	20	8/17/20-8/18/20	utility outage
6	4	Santa Clara	2	37.2	54%	500	8/17/20-8/18/20	utility outage
6	5	Santa Clara	2	37.3	38%	250	8/17/20-8/18/20	utility outage
6	6	Santa Clara	2	41.7	0%	20	8/17/20-8/18/20	utility outage
7	1	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	1	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	1	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	2	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	2	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	2	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	3	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	3	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	3	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	4	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	4	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	4	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	5	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	5	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	5	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	6	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	6	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	6	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	7	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	7	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	7	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	8	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	8	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	8	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	9	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	9	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	9	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	10	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	10	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	10	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

September 1, 2019 - September 30, 2020

Facility operator data, based on facility responses to BAAQMD's 9/25/20 data request and follow-up conversations. Data may be refined and additional information may be available during follow-up discussions.

Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
7	11	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	11	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	11	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	12	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	12	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	12	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	13	Santa Clara	2.5	3.5	48%	600	8/18/2020	Power outage
7	13	Santa Clara	2.5	3.5	48%	600	9/6/2020	Power outage
7	13	Santa Clara	2.5	2.5	48%	480	8/14/2020	Power outage
7	14	Santa Clara	2	3.7	45%	220	8/17-8/18	Power outage
7	14	Santa Clara	2	4.9	55%	370	9/6/2020	Power outage
7	15	Santa Clara	2	3.7	45%	210	8/17-8/18	Power outage
7	15	Santa Clara	2	0.4	50%	390	9/6/2020	Power outage
7	16	Santa Clara	2	3.7	45%	220	8/17-8/18	Power outage
7	16	Santa Clara	2	4.9	5%	1.5	9/6/2020	Power outage
7	17	Santa Clara	2	0.2	5%	1.4	8/17-8/18	Power outage
7	17	Santa Clara	2	0.2	5%	0.2	9/6/2020	Power outage
7	18	Santa Clara	2	3.7	40%	210	8/17-8/18	Power outage
7	18	Santa Clara	2	4.9	55%	400	9/6/2020	Power outage
7	19	Santa Clara	2	5.5	50%	360	8/17-8/18	Power outage
7	19	Santa Clara	2	4.9	60%	410	9/6/2020	Power outage
7	20	Santa Clara	2	5.5	50%	370	8/17-8/18	Power outage
7	20	Santa Clara	2	4.9	60%	410	9/6/2020	Power outage
7	21	Santa Clara	2	5.5	50%	370	8/17-8/18	Power outage
7	21	Santa Clara	2	4.9	60%	410	9/6/2020	Power outage
7	22	Santa Clara	2	5.5	50%	370	8/17-8/18	Power outage
7	22	Santa Clara	2	4.9	60%	410	9/6/2020	Power outage
7	23	Santa Clara	2	5.5	20%	150	8/17-8/18	Power outage
7	23	Santa Clara	2	0.7	15%	14	9/6/2020	Power outage
7	24	Santa Clara	2	0.2	5%	1	8/17-8/18	Power outage
7	24	Santa Clara	2	0.1	5%	1	9/6/2020	Power outage
8	1	Santa Clara	2	0.3	5%	2	11/27/2019	System-wide power quality event
8	1	Santa Clara	2	0.2	6%	2	2/15/2020	System-wide power quality event
8	2	Santa Clara	2	0.3	5%	2	11/27/2019	System-wide power quality event
8	2	Santa Clara	2	0.3	5%	2	2/15/2020	System-wide power quality event

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

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Facility operator data, based on facility responses to BAAQMD's 9/25/20 data request and follow-up conversations. Data may be refined and additional information may be available during follow-up discussions.

Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
8	3	Santa Clara	2	0.3	6%	2	11/27/2019	System-wide power quality event
8	3	Santa Clara	2	0.2	6%	2	2/15/2020	System-wide power quality event
8	4	Santa Clara	2	0.3	7%	2	2/15/2020	System-wide power quality event
8	4	Santa Clara	2	0.2	8%	2	11/27/2019	System-wide power quality event
8	5	Santa Clara	2	0.2	10%	2	11/27/2019	System-wide power quality event
8	5	Santa Clara	2	0.2	8%	2	2/15/2020	System-wide power quality event
8	6	Santa Clara	2	0.2	9%	2	11/27/2019	System-wide power quality event
8	6	Santa Clara	2	0.2	7%	2	2/15/2020	System-wide power quality event
8	7	Santa Clara	2	0.2	15%	2	11/27/2019	System-wide power quality event
8	7	Santa Clara	2	0.2	8%	2	2/15/2020	System-wide power quality event
8	8	Santa Clara	2	0.2	13%	2	11/27/2019	System-wide power quality event
8	8	Santa Clara	2	0.2	6%	2	2/15/2020	System-wide power quality event
8	9	Santa Clara	2	0.2	9%	2	11/27/2019	System-wide power quality event
8	9	Santa Clara	2	0.2	6%	2	2/15/2020	System-wide power quality event
8	10	Santa Clara	2	0.2	12%	2	11/27/2019	System-wide power quality event
8	10	Santa Clara	2	0.2	7%	2	2/15/2020	System-wide power quality event
8	11	Santa Clara	2	0.2	5%	2	11/27/2019	System-wide power quality event
8	11	Santa Clara	2	0.2	6%	2	2/15/2020	System-wide power quality event
8	12	Santa Clara	2	0.2	5%	2	11/27/2019	System-wide power quality event
8	12	Santa Clara	2	0.2	6%	2	2/15/2020	System-wide power quality event
8	13	Santa Clara	2	0.2	6%	2	11/27/2019	System-wide power quality event
8	13	Santa Clara	2	0.2	7%	2	2/15/2020	System-wide power quality event
8	14	Santa Clara	2	0.2	6%	2	11/27/2019	System-wide power quality event
8	14	Santa Clara	2	0.2	7%	2	2/15/2020	System-wide power quality event
8	15	Santa Clara	2	0.2	12%	2	11/27/2019	System-wide power quality event
8	15	Santa Clara	2	0.2	11%	2	2/15/2020	System-wide power quality event
8	16	Santa Clara	2	0.3	10%	2	11/27/2019	System-wide power quality event
8	16	Santa Clara	2	0.2	9%	2	2/15/2020	System-wide power quality event
8	17	Santa Clara	2	0.3	9%	2	11/27/2019	System-wide power quality event
8	17	Santa Clara	2	0.2	9%	2	2/15/2020	System-wide power quality event
8	18	Santa Clara	2	0.2	7%	2	11/27/2019	System-wide power quality event
8	18	Santa Clara	2	0.2	6%	2	2/15/2020	System-wide power quality event
8	19	Santa Clara	2	0.2	10%	2	11/27/2019	System-wide power quality event
8	19	Santa Clara	2	0.2	8%	2	2/15/2020	System-wide power quality event
8	20	Santa Clara	2	0.2	9%	2	11/27/2019	System-wide power quality event

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

September 1, 2019 - September 30, 2020

Facility operator data, based on facility responses to BAAQMD's 9/25/20 data request and follow-up conversations. Data may be refined and additional information may be available during follow-up discussions.

Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
8	20	Santa Clara	2	0.2	7%	2	2/15/2020	System-wide power quality event
8	21	Santa Clara	2	0.2	17%	2	11/27/2019	System-wide power quality event
8	21	Santa Clara	2	0.2	12%	2	2/15/2020	System-wide power quality event
8	22	Santa Clara	2	0.2	8%	2	11/27/2019	System-wide power quality event
8	22	Santa Clara	2	0.2	8%	2	2/15/2020	System-wide power quality event
8	23	Santa Clara	2	0.2	6%	2	11/27/2019	System-wide power quality event
8	23	Santa Clara	2	0.2	5%	2	2/15/2020	System-wide power quality event
8	24	Santa Clara	2	0.2	6%	2	11/27/2019	System-wide power quality event
8	24	Santa Clara	2	0.2	5%	2	2/15/2020	System-wide power quality event
9	1	Santa Clara	2	8.4	65%	524	8/17/20-8/18/20	State Emergency Load Shedding
9	2	Santa Clara	2	5.6	60%	400	8/17/20-8/18/20	State Emergency Load Shedding
9	3	Santa Clara	2	2.6	50%	300	8/17/20-8/18/20	Equipment failure
9	4	Santa Clara	2	2.9	1%	20	8/17/20-8/18/20	State Emergency Load Shedding
9	5	Santa Clara	0.23	6.5	7%	10	8/17/20-8/18/20	State Emergency Load Shedding
10	1	Santa Clara	2	9	50%	256	8/17/20-8/18/20	State Emergency Load Shedding
10	2	Santa Clara	2	9	50%	256	8/17/20-8/18/20	State Emergency Load Shedding
10	3	Santa Clara	2	9	50%	256	8/17/20-8/18/20	State Emergency Load Shedding
10	4	Santa Clara	2.06	4	60%	296	8/17/20-8/18/20	State Emergency Load Shedding
10	5	Santa Clara	2.06	4	60%	296	8/17/20-8/18/20	State Emergency Load Shedding
10	6	Santa Clara	2.06	4	60%	296	8/17/20-8/18/20	State Emergency Load Shedding
10	7	Santa Clara	3	7	40%	1280	8/17/20-8/18/20	State Emergency Load Shedding
10	7	Santa Clara	3	4	40%	731.5	8/17/20-8/18/20	State Emergency Load Shedding
10	8	Santa Clara	3	7	40%	1280	8/17/20-8/18/20	State Emergency Load Shedding
10	8	Santa Clara	3	4	40%	731.5	8/17/20-8/18/20	State Emergency Load Shedding
10	9	Santa Clara	3	7	40%	1280	8/17/20-8/18/20	State Emergency Load Shedding
10	9	Santa Clara	3	4	40%	731.5	8/17/20-8/18/20	State Emergency Load Shedding
10	10	Santa Clara	3	7	40%	1280	8/17/20-8/18/20	State Emergency Load Shedding
10	10	Santa Clara	3	4	40%	731.5	8/17/20-8/18/20	State Emergency Load Shedding
10	11	Santa Clara	3	5	50%	780	8/17/20-8/18/20	State Emergency Load Shedding
10	12	Santa Clara	3	5	50%	780	8/17/20-8/18/20	State Emergency Load Shedding
10	13	Santa Clara	3	5.5	50%	930	8/17/20-8/18/20	State Emergency Load Shedding
10	14	Santa Clara	3	5	50%	780	8/17/20-8/18/20	State Emergency Load Shedding
10	15	Santa Clara	3	5.5	50%	930	8/17/20-8/18/20	State Emergency Load Shedding
10	16	Santa Clara	3	5.5	50%	930	8/17/20-8/18/20	State Emergency Load Shedding
10	17	Santa Clara	2.75	9	70%	625	8/17/20-8/18/20	State Emergency Load Shedding

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

September 1, 2019 - September 30, 2020

Facility operator data, based on facility responses to BAAQMD's 9/25/20 data request and follow-up conversations. Data may be refined and additional information may be available during follow-up discussions.

Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
10	18	Santa Clara	2.75	8.2	70%	525	8/17/20-8/18/20	State Emergency Load Shedding
10	19	Santa Clara	2.75	8.9	70%	615	8/17/20-8/18/20	State Emergency Load Shedding
10	20	Santa Clara	2.75	11.3	70%	975	8/17/20-8/18/20	State Emergency Load Shedding
10	21	Santa Clara	2	4	60%	238	8/17/20-8/18/20	State Emergency Load Shedding
10	22	Santa Clara	3	5.5	50%	930	8/17/20-8/18/20	State Emergency Load Shedding
10	23	Santa Clara	3	5.5	50%	930	8/17/20-8/18/20	State Emergency Load Shedding
10	24	Santa Clara	3	5.5	50%	930	8/17/20-8/18/20	State Emergency Load Shedding
10	25	Santa Clara	2.75	8.3	70%	530	8/17/20-8/18/20	State Emergency Load Shedding
10	26	Santa Clara	2.75	8.3	70%	530	8/17/20-8/18/20	State Emergency Load Shedding
10	27	Santa Clara	2.75	8.3	70%	530	8/17/20-8/18/20	State Emergency Load Shedding
10	28	Santa Clara	2.75	8.3	70%	530	8/17/20-8/18/20	State Emergency Load Shedding
10	29	Santa Clara	3	11.6	60%	1786		Power bump
10	29	Santa Clara	3	4	60%	616		Power bump
10	29	Santa Clara	3	3.5	60%	539	8/17/20-8/18/20	State Emergency Load Shedding
10	29	Santa Clara	3	3	60%	462		Power bump
10	29	Santa Clara	3	2.7	60%	416		Power bump
10	29	Santa Clara	3	1	60%	154		Power bump
10	29	Santa Clara	3	1	60%	154		Utility outage
10	30	Santa Clara	3	10.1	60%	1555		Utility outage
10	30	Santa Clara	3	5.5	60%	847		Power bump
10	30	Santa Clara	3	4	60%	616		Utility outage
10	30	Santa Clara	3	3.7	60%	569.8	8/17/20-8/18/20	State Emergency Load Shedding
10	30	Santa Clara	3	2.8	60%	431		Power bump
10	30	Santa Clara	3	1	60%	154		Utility outage
10	30	Santa Clara	3	1	60%	154		Utility outage
10	31	Santa Clara	3	11.5	60%	1771		Utility outage
10	31	Santa Clara	3	4	60%	616		Utility outage
10	31	Santa Clara	3	3.7	60%	569.8	8/17/20-8/18/20	State Emergency Load Shedding
10	31	Santa Clara	3	3	60%	462		Power bump
10	31	Santa Clara	3	2.7	60%	416		Power bump
10	31	Santa Clara	3	1	60%	154		Utility outage
10	31	Santa Clara	3	1	60%	154		Utility outage
10	32	Santa Clara	3	11.6	60%	1786		Utility outage
10	32	Santa Clara	3	4	60%	616		Utility outage
10	32	Santa Clara	3	3	60%	462		Power bump

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

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Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
10	32	Santa Clara	3	3	60%	462	8/17/20-8/18/20	State Emergency Load Shedding
10	32	Santa Clara	3	2.7	60%	416		Power bump
10	32	Santa Clara	3	1	60%	154		Utility outage
10	32	Santa Clara	3	1	60%	154		Utility outage
10	33	Santa Clara	3	11.6	60%	1786		Utility outage
10	33	Santa Clara	3	4	60%	616		Utility outage
10	33	Santa Clara	3	3.7	60%	569.8	8/17/20-8/18/20	State Emergency Load Shedding
10	33	Santa Clara	3	3	60%	462		Power bump
10	33	Santa Clara	3	2.8	60%	431.2		Power bump
10	33	Santa Clara	3	1	60%	154		Utility outage
10	33	Santa Clara	3	1	60%	154		Utility outage
10	34	Santa Clara	3	11.6	60%	1786		Utility outage
10	34	Santa Clara	3	4	60%	616		Utility outage
10	34	Santa Clara	3	3.7	60%	569.8	8/17/20-8/18/20	State Emergency Load Shedding
10	34	Santa Clara	3	3	60%	462		Power bump
10	34	Santa Clara	3	2.9	60%	447		Power bump
10	34	Santa Clara	3	1	60%	154		Utility outage
10	34	Santa Clara	3	1	60%	154		Utility outage
10	35	Santa Clara	3	6	40%	450	8/17/20-8/18/20	State Emergency Load Shedding
10	36	Santa Clara	3	2	40%	150	8/17/20-8/18/20	State Emergency Load Shedding
10	37	Santa Clara	3	5.5	40%	412	8/17/20-8/18/20	State Emergency Load Shedding
10	38	Santa Clara	3	5.5	40%	412	8/17/20-8/18/20	State Emergency Load Shedding
10	39	Santa Clara	3	5.5	40%	412	8/17/20-8/18/20	State Emergency Load Shedding
10	40	Santa Clara	2.75	8.3	70%	530	8/17/20-8/18/20	State Emergency Load Shedding
11	1	Santa Clara	2	5.8	25%	390	8/17/20-8/18/20	Power supplier request
11	1	Santa Clara	2	4.1	25%	390	8/17/20-8/18/20	Power supplier request
11	2	Santa Clara	2	4.7	31%	280	8/17/20-8/18/20	Power supplier request
11	2	Santa Clara	2	3.9	31%	280	8/17/20-8/18/20	Power supplier request
11	3	Santa Clara	2	5.6	28%	380	8/17/20-8/18/20	Power supplier request
11	3	Santa Clara	2	4.3	28%	380	8/17/20-8/18/20	Power supplier request
11	4	Santa Clara	2	5.4	43%	605	8/17/20-8/18/20	Power supplier request
11	4	Santa Clara	2	3.5	43%	605	8/17/20-8/18/20	Power supplier request
11	5	Santa Clara	0.23	6	17%	27	8/17/20-8/18/20	Power supplier request
11	5	Santa Clara	0.23	3.5	17%	27	8/17/20-8/18/20	Power supplier request
11	6	Santa Clara	2	4.5	17%	75	8/17/20-8/18/20	Power supplier request

Preliminary back-up diesel engine operations (non-testing/non-maintenance) for select facilities in Santa Clara, Sunnyvale, and San Jose

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Data Center #	Engine #	City	Engine Size (MW)	Hours of operation (non-testing/non-maintenance)	Estimated engine load percentage during each non-testing/non-maintenance operations	Estimated fuel usage during each non-testing/non-maintenance operation (gallons)	Date	Explanation of non-testing/non-maintenance operation
11	7	Santa Clara	2	4.7	8%	75	8/17/20-8/18/20	Power supplier request
11	8	Santa Clara	2	4.7	8%	100	8/17/20-8/18/20	Power supplier request
11	9	Santa Clara	2	4.7	9%	100	8/17/20-8/18/20	Power supplier request
11	10	Santa Clara	2	4.8	11%	100	8/17/20-8/18/20	Power supplier request
11	11	Santa Clara	0.23	4.8	7%	30	8/17/20-8/18/20	Power supplier request
12	1	Santa Clara	0.23	2.9	14%	87	8/17/20-8/18/20	Utility outage
12	2	Santa Clara	2	43	8%	160	8/17/20-8/18/20	Utility outage
12	3	Santa Clara	2	42.8	6%	160	8/17/20-8/18/20	Utility outage
12	4	Santa Clara	2	38	15%	420	8/17/20-8/18/20	Utility outage
12	5	Santa Clara	2	24	55%	500	8/17/20-8/18/20	Utility outage
12	6	Santa Clara	2	10	6%	160	8/17/20-8/18/20	Utility outage
12	7	Santa Clara	2	10.4	7%	160	8/17/20-8/18/20	Utility outage
12	8	Santa Clara	2	42.1	30%	250	8/17/20-8/18/20	Utility outage
12	9	Santa Clara	2	41.8	30%	250	8/17/20-8/18/20	Utility outage
12	10	Santa Clara	2	10.3	1%	50	8/17/20-8/18/20	Utility outage
12	11	Santa Clara	2	10	7%	160	8/17/20-8/18/20	Utility outage
13	1	Santa Clara	2	19.8	37%	80.3	Various	Utility power outages; power blips, UPS/board repair
13	2	Santa Clara	2	20.4	37%	82.5	Various	Utility power outages; power blips, UPS/board repair
13	3	Santa Clara	1.25	14.96	43%	527	Various	Utility power outages; power blips, UPS/board repair
13	4	Santa Clara	1.25	14.94	42%	525	Various	Utility power outages; power blips, UPS/board repair
13	5	Santa Clara	1.25	14.92	43%	523	Various	Utility power outages; power blips, UPS/board repair
14	1	Santa Clara	2.7	1.9	22%	90	11/27/2019	Utility sag event
14	2	Santa Clara	2.7	1.9	32%	95	11/27/2019	Utility sag event
14	3	Santa Clara	2.7	1.9	1%	57	11/27/2019	Utility sag event
14	4	Santa Clara	2.7	1.9	34%	99.75	11/27/2019	Utility sag event
14	5	Santa Clara	2.7	4.4	41%	422	8/18/2020	Mandatory load transfer
14	6	Santa Clara	2.7	6.3	32%	445	8/18/2020	Mandatory load transfer
14	7	Santa Clara	2.7	4.7	2%	139	8/18/2020	Mandatory load transfer
14	8	Santa Clara	2.7	4.5	48%	123	8/18/2020	Mandatory load transfer
15	1	Santa Clara	2	14	65%	693		
15	2	Santa Clara	2	14	65%	693		
15	3	Santa Clara	2	14	65%	693		
15	4	Santa Clara	2	14				
15	5	Santa Clara	2	14				
15	6	Santa Clara	2.5	14	19%	486		

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15	7	Santa Clara	2.5	14				
16	1	Santa Clara	2	2.4	2%	45.6	7/31/2020	Utility power outage
16	2	Santa Clara	2	2.4	18%	48	7/31/2020	Utility power outage
16	3	Santa Clara	1.5	2.4	30%	40.8	7/31/2020	Utility power outage
16	4	Santa Clara	1.5	2.4	25%	38.4	7/31/2020	Utility power outage
17	1	San Jose	2	2	14%	80	11/26/2019	Commercial power outage
17	2	San Jose	2	2	14%	80	11/26/2019	Commercial power outage
18	1	San Jose	2	1.5	30%	150	8/16/2020	Utility power outage
18	1	San Jose	2	1.5	30%	150	8/25/2020	Utility power outage
18	2	San Jose	2	1.5	30%	150	8/16/2020	Utility power outage
18	2	San Jose	2	1.5	30%	150	8/25/2020	Utility power outage
18	3	San Jose	2	1.5	30%	150	8/16/2020	Utility power outage
18	3	San Jose	2	1.5	30%	150	8/25/2020	Utility power outage
18	4	San Jose	2	1.5	30%	150	8/16/2020	Utility power outage
18	4	San Jose	2	1.5	30%	150	8/25/2020	Utility power outage
18	5	San Jose	2	1.5	30%	150	8/16/2020	Utility power outage
18	5	San Jose	2	1.5	30%	150	8/25/2020	Utility power outage
18	6	San Jose	2	1.5	30%	150	8/16/2020	Utility power outage
18	6	San Jose	2	1.5	30%	150	8/25/2020	Utility power outage
19	1	San Jose	1.5	4	20%	200	8/19/2020	Substation transformer power equipment failure
19	2	San Jose	1.5	4	17%	190	8/19/2020	Substation transformer power equipment failure
19	3	San Jose	1.5	4	50%	290	8/19/2020	Substation transformer power equipment failure
19	4	San Jose	1.5	4	60%	310	8/19/2020	Substation transformer power equipment failure
19	5	San Jose	1.5	4	53%	300	8/19/2020	Substation transformer power equipment failure
19	6	San Jose	1.5	4	40%	280	8/19/2020	Substation transformer power equipment failure
20	1	Santa Clara	3	4.1	42%	410	8/18/2020	State Emergency Load Shedding
20	1	Santa Clara	3	3.5	42%	350	9/7/2020	State Emergency Load Shedding
20	1	Santa Clara	3	1.5	42%	150	8/17/2020	State Emergency Load Shedding
20	2	Santa Clara	3	4.1	37%	410	8/18/2020	State Emergency Load Shedding
20	2	Santa Clara	3	3.6	37%	360	9/7/2020	State Emergency Load Shedding
20	2	Santa Clara	3	2.6	37%	250	8/17/2020	State Emergency Load Shedding
20	3	Santa Clara	3	4.1	40%	410	8/18/2020	State Emergency Load Shedding
20	3	Santa Clara	3	3.6	40%	360	9/7/2020	State Emergency Load Shedding
20	3	Santa Clara	3	1.8	40%	180	8/17/2020	State Emergency Load Shedding
20	4	Santa Clara	3	4.1	38%	410	8/18/2020	State Emergency Load Shedding

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20	4	Santa Clara	3	3.6	38%	360	9/7/2020	State Emergency Load Shedding
20	4	Santa Clara	3	1.4	38%	150	8/17/2020	State Emergency Load Shedding
20	5	Santa Clara	3	4.2	20%	410	8/18/2020	State Emergency Load Shedding
20	5	Santa Clara	3	1.1	20%	120	8/17/2020	State Emergency Load Shedding
20	6	Santa Clara	3	4.1	17%	410	8/18/2020	State Emergency Load Shedding
20	6	Santa Clara	3	1.3	17%	130	8/17/2020	State Emergency Load Shedding
20	7	Santa Clara	3	4.1	18%	410	8/18/2020	State Emergency Load Shedding
20	7	Santa Clara	3	1.4	18%	140	8/17/2020	State Emergency Load Shedding
20	8	Santa Clara	3	4.1	19%	410	8/18/2020	State Emergency Load Shedding
20	8	Santa Clara	3	1.4	19%	140	8/17/2020	State Emergency Load Shedding
20	9	Santa Clara	3	4.2	15%	420	8/18/2020	State Emergency Load Shedding
20	9	Santa Clara	3	1.1	15%	110	8/17/2020	State Emergency Load Shedding
20	10	Santa Clara	3	4.1	29%	410	8/18/2020	State Emergency Load Shedding
20	10	Santa Clara	3	1.3	29%	130	8/17/2020	State Emergency Load Shedding
20	11	Santa Clara	3	4.3	18%	430	8/18/2020	State Emergency Load Shedding
20	11	Santa Clara	3	1.4	18%	140	8/17/2020	State Emergency Load Shedding
20	12	Santa Clara	3	4.1	19%	410	8/18/2020	State Emergency Load Shedding
20	12	Santa Clara	3	1.4	19%	140	8/17/2020	State Emergency Load Shedding
20	13	Santa Clara	3	4.1	3%	120	8/18/2020	State Emergency Load Shedding
20	13	Santa Clara	3	1.2	3%	40	8/17/2020	State Emergency Load Shedding
20	14	Santa Clara	3	4	2%	120	8/18/2020	State Emergency Load Shedding
20	14	Santa Clara	3	1.3	2%	40	8/17/2020	State Emergency Load Shedding
20	15	Santa Clara	3	4	2%	160	8/18/2020	State Emergency Load Shedding
20	15	Santa Clara	3	1.3	2%	50	8/17/2020	State Emergency Load Shedding
20	16	Santa Clara	3	2	30%	20	8/17/2020	State Emergency Load Shedding
20	16	Santa Clara	3	1.5	30%	20	8/18/2020	State Emergency Load Shedding
20	17	Santa Clara	3	0.9	10%	20	8/17/2020	State Emergency Load Shedding
20	17	Santa Clara	3	0.8	10%	20	8/18/2020	State Emergency Load Shedding