

DOCKETED

Docket Number:	20-SPPE-01
Project Title:	Great Oaks South Backup Generating Facility Small Power Plant Exemption
TN #:	238679
Document Title:	Great Oaks South Data Center Petition to Intervene
Description:	Sarvey Great Oaks South Data Center Petition to Intervene
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Organization:	Robert Sarvey
Submitter Role:	Intervenor
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State of California
State Energy Resources Conservation and Development Commission

In the matter of:

Great Oaks South Backup
Generating Station

Docket 20-SPPE-01

Robert Sarvey's Petition to intervene

Robert Sarvey hereby petitions to intervene in the Great Oaks South Backup Generating Station. Section 1207 of the Commission's Rules of Practice and Procedure allow that, "Any person may file with the Docket Unit or the presiding committee member a petition to intervene in any proceeding. The petition shall set forth the grounds for the intervention, the position and interest of the petitioner in the proceeding, the extent to which the petitioner desires to participate in the proceedings, and the name, address, and telephone number of the petitioner."

Petitioner is concerned about the plethora of large data centers being located in California and specifically in Santa Clara and San Jose. All of these data centers utilize massive amounts of diesel fired back-up generators which have no criteria, TAC, or GHG emissions limits during emergency operation. Despite the known environmental damage from employing multiple back up diesel generators government agencies continue to allow their use in large quantities at data centers when less damaging back up generation technology is available. Air Quality in the BAAQMD airshed is declining after years of improvement from the impacts of global warming and wildfires and the additional criteria pollutants from the project which will occur in the future are offset by worthless paper emission reduction credits sometimes generated decades before. The local and regional impacts from the project's emissions from just the testing of the back-up generators are significant.

Petitioner intervenes in support of CEC Staff's mitigation measure GHG-1. Petitioner wishes to advocate for cleaner technology and the elimination of diesel backup generation for the project. Petitioner believes the generating capacity of the Great South Oaks Generating Station exceeds 100 MW. Petitioner will advocate for the modeling of the project's emissions in emergency mode. The availability of energy resources to serve this project is in dispute in light of the state's electrical emergencies.

If granted intervention petitioner would like to participate in the topics of Alternatives, Air Quality, Energy Resources, GHG Emissions, Hazardous Materials, Public Health, Reliability, Efficiency, Traffic and Transportation, Biology, Environmental Justice, and Utilities and Service systems. Petitioner intends to participate fully in the proceeding including testimony, briefing and cross-examination of the parties' witnesses.

Respectfully submitted,
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