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STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

SAN JOSE CITY DATA CENTER

Docket No. 19-SPPE-04

**CALIFORNIA UNIONS FOR RELIABLE ENERGY
DATA REQUEST SET NUMBER THREE**

October 4, 2021

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Reliable Energy

**CALIFORNIA UNIONS FOR RELIABLE ENERGY
DATA REQUEST SET NUMBER THREE**

Pursuant to sections 1716 and 1941 of Title 20 of the California Code of Regulations, California Unions for Reliable Energy (“CURE”) requests the information in the enclosed Data Requests (“DR”) for the San Jose City Data Center, Docket No. 19-SPPE-04 (“Project”).

Section 1716 (b) grants “any party” the right to request from the applicant any information which is reasonably available to the applicant and relevant to the application proceedings or reasonably necessary to make any decision on the application. Pursuant to section 1941, data requests must be submitted no more than sixty days after a small power plant exemption (“SPPE”) application is filed. However, pursuant to section 1941, the presiding member may allow data requests to be submitted more than sixty days after an SPPE is filed.

In this case, there is good cause for the presiding member to allow CURE to submit additional data requests. The applicant filed an amended SPPE with a new reconductoring analysis on August 20, 2021. CURE seeks information related to the applicant’s amended application. Specifically, CURE seeks the information in Data Request Set Number Three, attached as Appendix A, pertaining to the air quality and biological resources impacts from the amended Project. Therefore, CURE respectfully requests that the presiding member allow CURE to submit its second set of data requests.

Dated: October 4, 2021

Respectfully submitted,



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APPENDIX A

AIR QUALITY AND PUBLIC HEALTH

The amended SPPE application does not contain all supporting information necessary to evaluate the accuracy of the air quality impacts and modeling. Please provide the following information:

1. Unlocked Excel spreadsheets supporting all emissions calculations, and all emissions reported in Tables 3.3-14 to 3.3-17 of SJC Data Center SPPE Application Filing Volume 1.
2. Unlocked CalEEMod files, showing all inputs and outputs, and
3. Air quality modeling files including all AERMOD input and output files in native electronic format, including supporting pre-processing (BPIP-PRIME, AERMAP) files, all met files in native electronic format, and all plot files in native electronic format.
4. Native format AERMOD files for all air quality modeling.
5. Meteorological data used in all air quality and health risk assessment modeling.
6. Native format HARP files for all health risk assessments.