

DOCKETED	
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Project Title:	Gilroy Backup Generating Facility
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Document Title:	Data Requests Set 4
Description:	Data requests re greenhouse gases
Filer:	Lon Payne
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October 29, 2021

Amazon Data Services, Inc.
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 4 for Gilroy Backup Generating Facility (20-SPPE-03)

Dear Mr. Galati:

Pursuant to Title 20, California Code of Regulations, sections 1941 and 1716, California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 4, which is necessary for staff analysis of the Gilroy Backup Generating Facility (GBGF) and associated Gilroy Data Center (GDC), collectively the "project" under the California Environmental Quality Act (CEQA). This Data Request Set 4 seeks further information in the technical area of greenhouse gas emissions. Staff may submit subsequent data requests in this and other resource areas, based on further information received or necessary for a complete analysis of the project.

Responses to the data requests are due to staff within 30 days. If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Committee within 20 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please email me at leonidas.payne@energy.ca.gov.

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Leonidas Payne
Project Manager

Enclosure: Data Request Set 4

GILROY BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 4

GREENHOUSE GAS EMISSIONS

BACKGROUND: Compliance with City of Gilroy 2040 General Plan

Page 126 of the SPPE application (TN 236004) lists the greenhouse gas (GHG) related policies included in the City of Gilroy 2040 General Plan that are applicable to the proposed project. However, the application did not discuss the project's compliance with these policies.

DATA REQUEST

54. Please describe the measures the project will incorporate to ensure compliance with the corresponding policies listed on page 126 of the SPPE application.

BACKGROUND: Analyzing GHG Impacts under CEQA

For data center projects recently analyzed by the CEC, the respective cities in which the facilities were located had adopted a qualified greenhouse gas reduction strategy (GHGRS) pursuant to sections 15064.4 and 15183.5(b) of Title 14 of the California Code of Regulations that staff could use to form the basis for part of the analysis. The City of Gilroy, in which this project would be located, has not adopted a GHGRS. If staff cannot rely on a GHGRS for part of its analysis, then a broader analysis under section 15064.4 must be undertaken. The application does not provide sufficient information to conduct this analysis.

DATA REQUESTS

55. Please describe if there is an applicable GHGRS that staff could use for the GHG analysis.
56. Please describe the appropriate timeframe staff should apply to this project for the analysis of greenhouse gas emissions.
57. Please discuss the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting. This discussion should include both the emissions resulting from the testing and maintenance of the backup generators and the indirect emissions associated with the data center's electricity use.

BACKGROUND: GHG Reduction Strategies for Energy Use

Electricity used by the project would be delivered by the Pacific Gas and Electric Company (PG&E). Similar to other data center projects, the major source of the project's operational GHG emissions is indirectly through the generation of

GILROY BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 4

electricity needed to serve the project. In absence of a qualified GHG reduction strategy staff can rely on in its environmental review, an analysis of the project's consistency with the State's long-term climate goals or strategies is necessary. The application does not discuss two key state climate provisions, SB 100 or SB 350, or how this project would be consistent with those provisions by way of PG&E's efforts to comply with them. Lastly, to mitigate for the GHG emissions from electricity use, one recent data center project (Great Oaks South Backup Generating Facility) has agreed to either purchase an existing utility-provided GHG-free electricity product or develop a clean energy program to mitigate its electricity use to a level equivalent to that product. Staff recognizes that the City of San Jose's adoption of its GHGRS requiring the purchase of such products was the main impetus for the proposal in that case; nonetheless, staff would like more information about what mitigation opportunities might be available for this project's electricity use.

DATA REQUESTS

58. Please discuss PG&E's Integrated Resource Plan and progress towards meeting goals beyond 2030.
59. Please discuss if PG&E currently produces sufficient electricity to meet the needs of the proposed GDC. If it does not, please describe how PG&E would procure or build additional resources to meet the project's need, and what those resources would be.
60. Please describe what GHG-free electricity products might be available for the GDC to purchase, or what independent programs the GDC could develop to reduce the GHG emissions resulting from the project's electricity use.