DOCKETED

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2022_08_08 Docket No 21- SPPE-01, CA3 Backup Generating Facility

Please see hopefully attached letter for â€œDocket No. 21-SPPE-01, CA3 Backup Generating Facility."

Additional submitted attachment is included below.

Monday, August 8, 2022, near 1 pm

California Energy Commission (CEC)

RE: "Docket No. 21-SPPE-01, CA3 Backup Generating Facility"

To Whom It May Concern:

Admittedly, I have not read much about this project, but have noticed that the proposed, Silicon Valley/Santa Clara County/San Jose area, CA3 [Vantage] Data Center has multiple small backup diesel generators to provide uninterruptible power during what is speculated to be a rare emergency and/or outage event, similar to several other area proposed data centers. Since this project is about to be approved formally at an upcoming CEC business meeting, and since I am participating late in this project's SPPE, I do not believe this comment to be of an issue to this particular project or its "people." Also admittedly, I realize "the working public" works to make money, support their families/investments/etc., and many do not have the patience, time and/or energy to say anything or evaluate works of others, plus may not relish potential scrutiny or job loss after facing extremely legally apt professionals. Therefore, since I, at the moment have the personal time, energy and patience, since I am currently unemployed, and since I have already faced some brutal legally apt professionals, I am going to mention a few concepts/ideas while these SPPEs continue to be reviewed. Hopefully, this does not hurt.

[By the way: to involve more pertinent, Silicon Valley residents, especially when nearby project residents do not become involved, I suggest the CEC reach out more aggressively by phone calling and knocking on doors. I think most residents consider themselves too busy and not pertinent enough, but might later easily suffer large and multiple corporate interests which invest in such facilities nearby their homes. For example: Across the street, while I was working full-time, a telecommunications company planned to install another cell tower within viewing distance. They installed a construction sign directly across the street in my viewing distance. I acted on that eventually, not immediately and potentially too late.]

What is "the message" that the Silicon Valley area is sending to the rest of the world, in wanting multiple data centers with multiple backup diesel generators?

If the purpose of these projects is to dampen the effects of short-lived outages and/or Public Safety Power Shutoffs (PSPS), and/or to strengthen Silicon Valley's substation network with newer construction funded by wealthier [than local utility] data center corporations with little intent to utilize emergency backup generation other than to "play" with it, then that is an entirely different "message" and investment to attempt to understand.

Years prior, renewable, clean and sustainable energy seemed "the message." Silicon area businesses seemed proud of sharing their renewably powered building investments. Is the Silicon Valley corporation "message" now updating the general public, that past "greener" investments were not adequate or cause bad environmental/political/supply chain damages?

Does Silicon Valley know of a diesel backup generator manufacturer's cheaper, more environmentally friendly machine glut that they wanted to take advantage of? Is diesel generator design considered so advanced, affordable and easy to obtain and operate that data centers cannot resist placing them in their designs? What do Silicon Valley data center corporate leaders want to convey in messaging to general public "masses" especially after so much mass protesting of oil/gas systems? Is the "embodied carbon" of the diesel supply chain considered "normal"?

Is this type of data center design being mimicked? It seems that way.

Is the need for this type of backup emergency generation necessary? It seems that in some data center cases the answer would be "yes" and in many cases the answer maybe "no." Of course, if the data center business belongs to an owner, the owner will probably state that the business needs uninterruptible power and work to justify the need. In the past, critical and less critical assets were identified. To "suffer" diesel design more and especially cumulative diesel design, perhaps Californians ought to identify businesses which are "critical assets" and which ones are not.

In the cumulative potential issue "problem set," <u>has the CEC considered the capacity of diesel, renewable and not, in a long time period emergency, especially if multiple data centers with backup diesel generation are installed in the same area</u>? Is this capacity potentially a limiting resource, a "substantial adverse impact on energy resources" capable of not approving a potential SPPE? I hope this is, has been adequately considered and/or will be in future SPPEs.

I realize long time period emergencies are extremely rare according to data for the San Jose area, but after personally slightly suffering the Loma Prieta earthquake in 1989, which occurred in the Santa Cruz and greater Bay Areas – and whereas many suffered greatly, I hesitate to think these new data center "emergency definitions" are making sense. I believe as a member of California's general public, we might want to be prepared to not need less critical data center software, allow hauling diesel around in especially hazardous emergency conditions, and focus on emergency operations, if an emergency of this magnitude happens.

No need to answer these questions of mine, though as leaders in policy and/or in high technology as Silicon Valley has purported to be, one might consider the concepts and attempt to speak or write on the subjects if at all possible.

I hope some kind of "message" that makes sense to the general public, especially for/in an "emergency," or outage, after installation is ready. Of course, ideally no emergency or outage will happen. Non-sarcastically, best of luck and success with that concept.

Sincerely,

Claire Warshaw