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STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of:

Application For Small Power Plant
Exemption for the
**McLAREN BACKUP GENERATING
FACILITY**

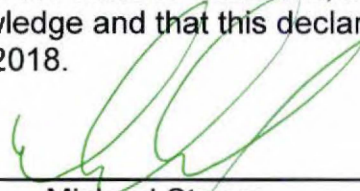
DOCKET NO. 17-SPPE-01

**DECLARATION OF MICHAEL
STONER**

I, Michael Stoner, declare as follows:

1. I am presently employed as a Principal with Lake Street Consulting.
2. I have been engaged by Vantage Data Centers to be the Project Manager for the development of the McLaren Backup Generating Facility and the McLaren Data Center.
3. A copy of my professional qualifications and experience was included with my previously filed Opening Testimony and is incorporated by reference in this Declaration.
4. I prepared the attached Rebuttal Testimony relating to Project Description for the Application for Small Power Plant Exemption for the McLaren Backup Generating Facility (California Energy Commission Docket Number 17-SPPE-01).
5. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.
6. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed at Santa Clara, California on August 17, 2018.



Michael Stoner

STATE OF CALIFORNIA

Energy Resources
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DOCKET NO. 17-SPPE-01

**DECLARATION OF SPENCER
MYERS**

I, Spencer Myers, declare as follows:

1. I am presently employed as a Senior Director of Construction for Vantage Data Centers.
2. A copy of my professional qualifications and experience is included with this Rebuttal Testimony and is incorporated by reference in this Declaration.
3. I prepared the attached Rebuttal Testimony relating to Project Description for the Application for Small Power Plant Exemption for the McLaren Backup Generating Facility (California Energy Commission Docket Number 17-SPPE-01).
4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.
5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed at Santa Clara, California on August 17, 2018.



Spencer Myers

**VANTAGE DATA CENTERS
McLAREN BACKUP GENERATING FACILITY
PROJECT DESCRIPTION
REBUTTAL TESTIMONY**

I. Name: Michael Stoner
Spencer Myers

II. Purpose:

Our Rebuttal Testimony addresses the recent Response to Comments, Response to Motion to Dismiss, Response to Motion For New Schedule (filed by the California Energy Commission Staff (Staff Response, TN 225479) associated with the construction and operation of the McLaren Backup Generating Facility (MBGF) (CEC Docket 17-SPPE-1). Our Rebuttal Testimony specifically provides additional information in support of Staff's responses to comments on the Project Description and scope of review concerning emergency operations and overall project purpose and objectives.

III. Qualifications:

Michael Stoner: I am presently employed as a Principal at Lake Street Consulting and have been for the past 18 years. I have a Bachelor of Science Degree in Civil Engineering from University of Washington and I have 29 years of experience in development within California. I am engaged by Vantage Data Centers to be the Project Manager for development of the McLaren Backup Generating Facility and the McLaren Data Center. A detailed description of my qualifications was presented in the resume which is included in Attachment A to my previously filed Opening Testimony Package.

Spencer Myers: I am presently employed by Vantage as the Senior Director of Construction and have been for the past 4 years. I have 18 years of experience in design and construction in California and other western states. My resume is included in Attachment A to this Rebuttal Testimony package.

To the best of our knowledge all referenced documents and all of the facts contained in this testimony are true and correct. To the extent this testimony contains opinions, such opinions are our own. We make these statements and provide these opinions freely and under oath for the purpose of constituting sworn testimony in this proceeding.

IV. Opinion and Conclusions

We have reviewed Staff Response docketed on July 13, 2018 and we agree with its findings, analysis and conclusions and also believe that the comments made by Intervenor Helping Hands Tools and Clean Coalition have no merit and therefore, the Initial Study/Mitigated Negative Declaration adequately evaluates the potential effects of the MBGF.

We offer the following two additions to the Staff Response relevant to the Project Description, Purpose and Objectives.

Project Objectives

Staff provided responses to comments HH-4 and CC-1 that we believe addresses why modeling of air emissions during emergency operation is speculative, infeasible, and not required by the California Environmental Quality Act (CEQA).

It is important to note that Vantage provides security for its customers so that they can rely on the safety and accessibility of their critical business electronic data. Although an outage is very unlikely, it is not impossible. Since the loss of a business' critical data could be catastrophic, Vantage has invested heavily in constructing the distribution substation for Silicon Valley Power (SVP), which is dedicated solely to distribute electricity to the MDC. The SVP substation is connected directly to the transmission system and the SVP Substation is served by redundant utility feeds. Vantage's investment in the dedicated SVP distribution substation will provide further protection from utility outages.

The fact that an outage is possible and Vantage has designed the MBGF to address this possibility does not make the outage reasonably foreseeable requiring its analysis under CEQA. Vantage's investment in the SVP system is designed to prevent an outage. But since the critical nature of the business data secured on Vantage's clients' services, the mere possibility of electrical interruption solely drives the project objectives of the MBGF.

Similar project features include fire protection systems incorporated into the design of the MDC. Just because a fire is possible, CEQA does not require an analysis of the amount of water that would be used by the MDC sprinkler system during a possible fire. This fact alone does not make a possible fire a reasonably foreseeable emergency because Vantage has decided to plan for it. Additionally, air and public health analyses of the emissions during a fire are also speculative and not appropriate for prediction or analysis.

Vantage has invested in the SVP system and a robust battery UPS system to avoid having to operate the MBGF during an emergency. It is simply that Vantage cannot foresee every possible scenario that could cause SVP to be unable to deliver electricity to the MDC that provides the need for the MBGF.

SVP Transmission Loop

Staff describes the SVP system in its Introduction to the McLaren Data Center. We believe that the MDC distribution substation will be connected into a 60kV loop and not a 12kV loop. Vantage believes that having the substation on the 60kV system also improves electrical reliability to the MDC, further reducing the possibility of needing to operate the MBGF.

ATTACHMENT A
RESUMES

Spencer Myers

Senior Director of Construction



EDUCATION

Technical and Electrical Studies,
Evergreen Valley College

PROFESSIONAL CAREER

1988-Present

As Senior Director of Construction, Spencer's varied technical experience and proven leadership provide a sound background for managing diverse, large-scale projects. During his tenure with Vantage Data Centers, from 2014 to present time, his projects have included client tenant improvements, retrofits of existing critical MEP infrastructure, and large scale ground up construction. During his tenure with Alfa Tech, from 2000 to 2014, he served as the lead Project Manager for the entire firm's work with Lockheed Martin, a relationship that lasted over a decade and nearly 100 projects. Also, while at Alfa Tech, he project-managed several large-scale data center projects for VMware, PG&E, Sun Microsystems, & Symantec.

Project Highlights at Vantage Data Centers

Senior Director of Construction over Large-Scale Data Center Projects & Project Teams

- Santa Clara, CA
 - \$195M, four story, 21MW data center inclusive of 50MW substation
 - \$150M, single story, 16MW data center
 - \$175M, four story, 15MW data center
 - \$113M, two story, 9MW data center
 - \$54M, two story, 6MW data center
 - \$25M, infrastructure upgrade project adding four 2.75MW generators and central plant upgrade which added 2 chillers & cooling towers inclusive of a complete controls upgrade during live operation
 - \$3M, infrastructure upgrade adding one 2.75MW generator to the Central Mechanical Plan inclusive of fuel tank storage upgrade
 - \$35M, single story, 6MW data center upgrade project in an existing building shell
 - \$72M, two story, 9MW data center upgrade project in an existing building shell
 - \$40M of managed tenant fit up projects for customers within Vantage Data Centers space

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DOCKET NO. 17-SPPE-01

**DECLARATION OF SHARI BETH
LIBICKI**

I, Shari Beth Libicki, declare as follows:

1. I am presently employed as Ramboll's Global Air Quality Service Line.
2. A copy of my professional qualifications and experience was included with the previously filed Opening Testimony and is incorporated by reference in this Declaration.
3. I prepared the attached Rebuttal Testimony relating to Air Quality and Public Health for the Application for Small Power Plant Exemption for the McLaren Backup Generating Facility (California Energy Commission Docket Number 17-SPPE-01).
4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.
5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed at San Francisco on August 20, 2018.



Shari Beth Libicki

**VANTAGE DATA CENTERS
McLAREN BACKUP GENERATING FACILITY
AIR QUALITY AND PUBLIC HEALTH
REBUTTAL TESTIMONY**

I. Name: Shari Beth Lbicki

II. Purpose:

My Rebuttal Testimony addresses the recent Response to Comments, Response to Motion to Dismiss, Response to Motion For New Schedule (filed by the California Energy Commission Staff (Staff Response, TN 225479) associated with the construction and operation of the McLaren Backup Generating Facility (MBGF) (CEC Docket 17-SPPE-1). My Rebuttal Testimony specifically provides additional information in support of Staff's responses to comments relating to Air Quality and Public Health.

III. Qualifications:

Shari Beth Libicki: I am presently employed as Ramboll's Air Quality Service Line Leader and have been for the past 15 years in that position and at Ramboll for 29 years. I have a Doctorate Degree in Chemical Engineering from Stanford University and I have 29 years of experience in conducting air quality and public health analyses within California and other western states.

I have been engaged by Vantage Data Centers to prepare the Bay Area Air Quality Management District Authority to Construct applications and the air quality and public health analyses for development of the McLaren Backup Generating Facility. I prepared the Air Quality section of the Application For Small Power Plant Exemption and Air Quality Technical Reports, as well as the post-filing information, data responses, and supplemental filings.

To the best of my knowledge all referenced documents and all of the facts contained in this testimony are true and correct. To the extent this testimony contains opinions, such opinions are my own. I make these statements and provide these opinions freely and under oath for the purpose of constituting sworn testimony in this proceeding.

IV. Opinion and Conclusions

I have reviewed Staff Response docketed on July 13, 2018 and I agree with its findings, analysis and conclusions and also believe that the comments made by Intervenor Helping Hands Tools and Clean Coalition

have no merit and therefore, the Initial Study/Mitigated Negative Declaration adequately evaluates the potential effects of the MBGF.

I offer the following additions to the Staff Response relevant to the Air Quality and Public Health.

Health Risk Assessment

Staff provided responses to comments HH-4, CC-1, and HH-5 that I believe addresses why modeling of air emissions during emergency operation is speculative, infeasible, and not required by the California Environmental Quality Act (CEQA).

With respect to the Health Risk Assessment that was performed for the MBGF, Intervenor Helping Hand Tools inappropriately concluded that the MBGF's acute health risk of 0.8 should be multiplied by 47 to generate a worst case analysis of emergency operations. Health Risk Assessments are often performed in two steps; a screening analysis and, if necessary, a refined analysis. The Health Risk Assessment presented in the SPPE Application was a screening analysis and assumed **all** generators were operating. Since the screening analysis determined that operation of all generators was below the threshold of significance, a refined analysis of was not performed. A refined analysis would demonstrate that the public health indices for maintenance testing of the generators are significantly lower than the results of the screening analysis.