

**DOCKETED**

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<b>Project Title:</b>	Walsh Data Center
<b>TN #:</b>	230449
<b>Document Title:</b>	WP LLC Supplemental Status Report 2
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<b>Filer:</b>	Scott Galati
<b>Organization:</b>	DayZenLLC
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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 **WALSH BACKUP  
GENERATING FACILITY**

**DOCKET NO: 19-SPPE-2**

**651 WALSH PARTNERS, LLC'S  
SUPPLEMENTAL STATUS REPORT  
2**

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651 Walsh Partners, LLC (WP, LLC) previously filed a Supplemental Status Report on September 23, 2019 to update the Committee on the progress of the proceeding and to assist the Committee in developing a schedule. In that response WP, LLC, informed the Committee that due to the amount of time required to prepare the information Staff requested in Data Requests Set 1 and Set 2, WP, LLC has not yet been able to file its complete supplemental responses. WP, LLC has filed complete responses to Data Request Set 2 on October 22, 2019 (TN# 230307). Additionally, WP, LLC filed the thermal plume analysis and the estimate of construction traffic trips on October 31, 2019. However, WP, LLC is still completing the studies necessary to respond to two Data Requests that are outstanding from Data Request Set 1. The first is the Cultural Resources and Historical Report which will be completed by November 15, 2019.

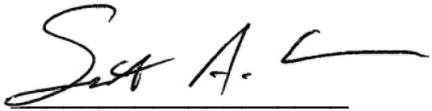
The second is the Cumulative Air Quality Impact Analysis. In order to complete the analysis that Staff outlined in its Data Request, WP, LLC has attempted to obtain information from the Bay Area Air Quality Management District (District). However, the District has responded that is unable to provide the information. Therefore, WP, LLC will provide a Cumulative Impact Analysis using the District guidelines rather than the modeling analysis requested by Staff, which cannot be completed without the District provided information. WP, LLC would like the Committee to note that this alternative

method for evaluating cumulative impacts focuses on risks to the public from emissions and is the same type of analysis used on the Vantage McLaren Backup Generating Facility (17-SPPE-01). This cumulative risk analysis will be performed in accordance with the District guidelines and is routinely used by cities and counties in the Bay Area for CEQA analyses. WP, LLC proposes to complete and docket this analysis by November 15, 2019.

WP, LLC believes that if it provides the outstanding information to Staff on or before November 15, 2019, Staff will be able to publish the IS/MND in December, 2019.

Dated: October 31, 2019

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Scott A. Galati", with a horizontal line underneath it.

Scott A. Galati  
Counsel to 651 Walsh Partners, LLC