

**DOCKETED**

<b>Docket Number:</b>	19-SPPE-03
<b>Project Title:</b>	Sequoia Data Center
<b>TN #:</b>	231245
<b>Document Title:</b>	Sarvey Petition to intervene
<b>Description:</b>	Petition to intervene
<b>Filer:</b>	Robert Sarvey
<b>Organization:</b>	Robert Sarvey
<b>Submitter Role:</b>	Intervenor
<b>Submission Date:</b>	12/14/2019 2:58:29 PM
<b>Docketed Date:</b>	12/16/2019

State of California  
State Energy Resources Conservation and Development Commission

In the matter of:

Sequoia Data Center

Docket 19-SPPE-03

Robert Sarvey's Petition to intervene

Robert Sarvey hereby petitions to intervene in the Sequoia Data Center Docket 19-SPPE-03. Section 1207 of the Commission's Rules of Practice and Procedure allow that, "Any person may file with the Docket Unit or the presiding committee member a petition to intervene in any proceeding. The petition shall set forth the grounds for the intervention, the position and interest of the petitioner in the proceeding, the extent to which the petitioner desires to participate in the proceedings, and the name, address, and telephone number of the petitioner."

Petitioner is concerned about the plethora of data centers being located in California and specifically in Santa Clara's low-income communities. All of these data centers utilize massive amounts of diesel fired back-up generators which have no criteria, TAC, or GHG emissions limits during emergency operation. Despite the known environmental damage from employing multiple back up diesel generators government agencies continue to allow there use in large quantities at data centers when less damaging back up generation technology is available. Air Quality in the BAAQMD airshed is suddenly declining after years of improvement from the impacts of global warming and wildfires and the additional criteria pollutants from the SDC which will occur in the future are offset by worthless paper emission reduction credits sometimes generated decades before. The local and regional impacts from the project's emissions from just the testing of the back-up generators are significant.

The Sequoia Data like other large data centers is an energy HOG. On an annual basis, SDC would consume up to the maximum electrical usage of 655,633 MWh. This massive amount of energy use will lead to large amount of indirect GHG emissions. The SDC would have a PUE of 1.43 at peak operating capacity leading to excessive GHG emissions compared to other modern data centers.

The SDC in conjunction with other data centers will create a need for new substations, power generation facilities and other transmission upgrades.

Petitioner also believes that the project does not qualify for SPPE treatment with 54 – 2.25 MW generators. The SVP artificial 100 MW cap is not enforceable and all of the individual users of the data center will negotiate their own energy contracts so SVP would have to aggregate all of the user's electrical requirements to apply the cap.

If granted intervention petitioner would like to participate in the topics of Alternatives, Air Quality, Energy Resources, GHG Emissions, Hazardous Materials, Public Health, Reliability, Efficiency, Water Resources, Traffic and Transportation, Biology, and Environmental Justice, and Utilities and Service systems. Petitioner intends to participate fully providing testimony, briefing, and cross-examination of witnesses.

Respectfully submitted,  
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