

**DOCKETED**

<b>Docket Number:</b>	19-SPPE-02
<b>Project Title:</b>	Walsh Data Center
<b>TN #:</b>	232587
<b>Document Title:</b>	Petition to intervene
<b>Description:</b>	Petition to intervene of Robert Sarvey
<b>Filer:</b>	Robert Sarvey
<b>Organization:</b>	Robert Sarvey
<b>Submitter Role:</b>	Intervenor
<b>Submission Date:</b>	3/30/2020 11:27:28 AM
<b>Docketed Date:</b>	3/30/2020

State of California  
State Energy Resources Conservation and Development Commission

In the matter of:

Walsh Data Center

Docket 19-SPPE-02

Robert Sarvey's Petition to intervene

Robert Sarvey hereby petitions to intervene in the Walsh Data Center Docket 19-SPPE-02. 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 large number 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 Walsh Data Center 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 Walsh Data Center like other large data centers is a large consumer of electricity. On an annual basis, the WDC would consume up to the maximum electrical usage of 700,800 MWh per year.<sup>1</sup> This massive amount of energy use will lead to a large amount

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<sup>1</sup> TN 228877-2 Application for SPPE for the Walsh Backup Generating Facility Page 111 of 203

of indirect GHG emissions. The PUE of the proposed data center would be 1.5<sup>2</sup> which is much higher than many of the data centers operating in Sant Clara.

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

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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<sup>2</sup> TN 228877-2 Application for SPPE for the Walsh Backup Generating Facility Page 113 of 203