

DOCKETED

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**CALIFORNIA
ENERGY COMMISSION**



**CALIFORNIA
natural
resources
AGENCY**

April 16, 2020

SV1, LLC
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, CA 95608

Data Requests Set 1 for Great Oaks South Backup Generating Facility (20-SPPE-01)

Dear Mr. Galati:

Pursuant to Title 20, California Code of Regulations, sections 1941 and 1716, California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 2, which is necessary for a complete staff analysis of the Great Oaks South Backup Generating Facility (GOSBGF) and associated Great Oaks South Data Center (GOSDC), collectively the "project" under the California Environmental Quality Act (CEQA).

Responses to the data requests are due to staff within 30 days. If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send written notice to me and the Committee (not yet assigned) within 20 days of receipt of this letter. Such written notification must contain the reasons for not providing the information, the need for additional time, or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please email me at lisa.worrall@energy.ca.gov.

/s/

Lisa Worrall
Senior Environmental Planner

Enclosure: Data Requests Set 2

**GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE
DATA REQUESTS SET 2**

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GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 2

AIR QUALITY AND PUBLIC HEALTH

BACKGROUND: Air Quality District Application

The proposed project would require a permit from the Bay Area Air Quality Management District (district or BAAQMD). For purposes of consistency, staff needs copies of all correspondence between the applicant and the district in a timely manner in order to stay up to date on any issues that arise prior to completion of the initial study.

DATA REQUEST

1. Please provide copies of all substantive district correspondence regarding the application to the district, including e-mails, within one week of submittal or receipt. This request is in effect until staff publishes the initial study.

BACKGROUND: CALEEMOD Modeling Files

The applicant used CalEEMod to estimate construction emissions (shown in Table 4.5-6 of the SPPE application) and miscellaneous operational emissions (shown in Table 4.5-15). To validate the applicant's work, staff requests the CalEEMod input and output files that the applicant used to estimate emissions.

DATA REQUEST

2. Please provide the CalEEMod input and output files used to estimate construction emissions (shown in Table 4.5-6) and miscellaneous operational emissions (shown in Table 4.5-15).

BACKGROUND: Construction Impacts Analysis

The applicant provided ground-level impacts analysis for criteria pollutants during maintenance and testing of the standby engines of the project. The applicant also provided health risks assessment for the construction period. However, the applicant did not provide ground-level impacts analysis for criteria pollutants during construction of the project. Staff needs a construction modeling analysis or justification for not doing ground-level impacts analysis for criteria pollutants during construction of the project.

DATA REQUESTS

3. Please justify why ground-level impacts analysis was not done for criteria pollutants during construction of the project.
4. Please provide ground-level impacts analysis for criteria pollutants during construction of the project to show compliance with the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).

GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 2

BACKGROUND: Construction Period

Section 2.2.13 on page 18 of the SPPE application (TN 232466) states that:

Project construction includes three separate phases for each of the three buildings. Construction of the first GOSDC building, SV12, would begin in the fourth quarter of 2020 and is anticipated to finish in the first quarter of 2022, for a total of up to 15 months. Construction of the second GOSDC building, SV18, would begin in the second quarter of 2023 and is anticipated to finish in the fourth quarter of 2024, for a total of up to 18 months. Construction of the third GOSDC building, SV19, would begin in the second quarter of 2026 and is anticipated to finish in the fourth quarter of 2027, for a total of up to 18 months.

The total construction period would be up to 51 (=15+18+18) months spreading over different years. However, section 4.5.2.2 on page 70 of the SPPE application states that emissions from the 47-month construction period were estimated using the CalEEMod program. Pages 76 and 77 of 283 of the SPPE application Appendices A-F (TN 232467-1) show that construction start date was set as 7-8-2020 and end date was set as 9-30-2024 in CalEEMod. The total number of modeled months is about 51 months, which agrees with the description in section 2.2.13. However, the applicant used CalEEMod to estimate the construction emissions continuously from 7-8-2020 to 9-30-2024, while section 2.2.13 shows that the three construction phases would not be continuous. In addition, the 47-month construction period shown in section 4.5.2.2 does not agree with the assumptions in CalEEMod or section 2.2.13 (51 months). Staff would like to have a clarification on the length of the construction period. Staff would also like to know why it would take so much time to construct the proposed project, while it would only take less than 2 years (24 months) to construct other data centers.

DATA REQUESTS

5. Please explain why it would take so much time to construct the proposed project.
6. Please clarify the length of the construction period.
7. Please explain whether CalEEMod provides conservative emissions estimates assuming continuous construction period, rather than using the construction schedule specified in section 2.2.13.

BACKGROUND: Construction Off-Road Equipment Mitigation

Page 69 of 283 of the SPPE application Appendices A-F (TN 232467-1) shows that the applicant assumed Tier 3 engines for the construction period (2020-2024) as construction off-road equipment mitigation. As the construction equipment and vehicle fleet would likely contain a mix of Tier 3 and earlier engines, staff would like to know if the applicant would incorporate a mitigation measure to enforce the use of Tier 3 engines.

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DATA REQUESTS

8. Please propose a mitigation measure to require Tier 3 or better off-road equipment to be used during construction of the project.
9. Please indicate if any other mitigation measures or assumptions were used in CalEEMod to estimate construction emissions.

BACKGROUND: Vehicle Speed During Construction

Page 71 of the SPPE application (TN 232466) states that all vehicle speeds on onsite unpaved surfaces would be limited to 5 miles per hour (mph) as part of the mitigation **PD AQ-1**. However, the BAAQMD 2017 CEQA Guidelines only requires speed limit of 15 mph. Staff would like to confirm whether the applicant agrees to the speed limit of 5 mph, instead of 15 mph.

DATA REQUEST

10. Please confirm the vehicle speed limit to be imposed on onsite unpaved surfaces.

BACKGROUND: Modeled Emission Rates Inconsistency

The application does not show how the modeled emission rates for PM2.5 and for health risks assessment were derived. Staff is not able to match the modeled emission rates with those shown in Table 4.5-6 (Summary of construction emissions) with the assumption of construction activities occurring 10 hours/day. Staff needs detailed calculations to show that the modeled emission rates match those provided in Table 4.5-6 for construction of the project.

In addition, for maintenance/readiness testing of the engines, the applicant also modeled project impacts assuming testing only occurs 10 hours/day. However, staff is not able to match the modeled emission rates with the annual emissions and the assumption of testing only occurring 10 hours/day in the health risks assessment for maintenance/readiness testing of the engines.

DATA REQUESTS

11. Please provide detailed calculations to show that the modeled emission rates for PM2.5 and health risks assessment match those provided in Table 4.5-6 for construction with the assumption of construction activities occurring 10 hours/day. If these are computed using a spreadsheet, please provide it.
12. Please provide detailed calculations to show the modeled emission rates for the health risks assessment for maintenance/readiness testing of the engines to match the annual emissions with the assumption of such testing only occur 10 hours/day. If these are computed using a spreadsheet, please provide it.

GREAT OAKS SOUTH BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 2

13. Please revise the PM_{2.5} impacts analysis and health risks assessment for construction and maintenance and testing of the standby engines of the project if needed.

BACKGROUND: Emission Factors

Starting from page 72, the SPPE application shows six scenarios to calculate standby engine emissions during maintenance and readiness testing and emergency operations. Scenarios 3 through 5 used EPA 40 CFR 89 D2 cycle weighted emission factors, which are lower than the Tier 2 emissions factors used for Scenarios 1 and 2. Table 4.5-23 on page 99 of the SPPE application compares annual emissions calculated based on Scenario 4 (with EPA 40 CFR 89 D2 cycle weighted emission factors) with BAAQMD significance thresholds. The applicant's proposed NO_x offsets are also based on NO_x emissions from Scenario 4 (with EPA 40 CFR 89 D2 cycle weighted emission factors). The applicant estimated annual NO_x emissions from Scenario 4 to be 16.3 tons per year (tpy), which is lower than the annual NO_x emissions of 16.76 tpy from Scenario 2 using Tier 2 emission factors (shown in Table 4.5-8). Staff needs justification for using the lower EPA 40 CFR 89 D2 cycle weighted emission factors as basis for offsetting the project's NO_x emissions, rather than using higher Tier 2 emission factors.

DATA REQUESTS

14. Please provide reference and detailed calculations to show how the EPA 40 CFR 89 D2 cycle weighted emission factors were derived.
15. Please provide justification for using the lower EPA 40 CFR 89 D2 cycle weighted emission factors as basis for offsetting the project's NO_x emissions, rather than using higher Tier 2 emission factors.

BACKGROUND: Diesel Particulate Filters

Page 98 of the SPPE application shows that the standby engines would be EPA certified Tier 2 units equipped with diesel particulate filters (DPFs). However, the SPPE application does not show the make or model or control efficiency of the DPFs. Staff needs such information to complete the initial study.

DATA REQUEST

16. Please provide make and model of the DPFs.
17. Please provide control efficiency of the DPFs and explain whether the control efficiency would change during intermittent maintenance and testing of the standby engines.

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BACKGROUND: Testing and Maintenance Frequencies and Loading

Page 18 of the SPPE application states that Section 4.5 provides a complete description of the testing and maintenance frequencies and loading proposed for the GOSBGF. However, staff is not able to find such description. Staff needs a detailed description of the testing and maintenance frequencies and standby engine load points to verify assumptions used in the SPPE analysis.

DATA REQUEST

18. Please provide a detailed description of the testing and maintenance frequencies and standby engine load points for the Cummins QSK95-G9 and Cummins QSX15-G9 engines. For example, the description could include the length and engine load points for each weekly, monthly, quarterly, and annual testing and maintenance events.

BACKGROUND: Testing and Maintenance Limits

The annual emissions and impacts analysis in the SPPE application is based on the assumption of 20 hours per year of testing and maintenance. The daily emissions and impacts analysis is based on the assumption of testing 6 larger QSK95 engines or 3 smaller QSX15 per day. It is also assumed that the engines would be tested only during 7 AM to 5 PM in the impacts analysis. In addition, the short-term impacts analysis assumes only one engine will be tested at any one time during a single hour. Staff would like to verify that these assumptions would be made enforceable.

DATA REQUESTS

19. Please confirm that the applicant would request the district to require an enforceable limit that would allow no more than 20 hours per year per engine for readiness and maintenance testing.
20. Please confirm that the applicant would request the district to require an enforceable limit that would allow testing of no more than 6 larger QSK95 engines or 3 smaller QSX15 per day.
21. Please confirm that the applicant would request the district to require an enforceable limit that would allow testing of engines only between 7 AM to 5 PM daily.
22. Please confirm that the applicant would request the district to require an enforceable limit on concurrent testing of engines so that only a single engine operates for maintenance and testing at any given time.

BACKGROUND: VOC Emissions for the Diesel Storage Tanks

Table 4.5-23 on page 99 of the SPPE application shows VOC emissions from diesel storage tanks would be less than 0.1 tpy. However, the application does not provide

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detailed calculations for the VOC emissions from diesel storage tanks. It is also unknown whether the VOC emissions shown in Table 4.5-23 include those from the diesel storage tanks or during transfer of diesel into the tanks. The application does not mention whether there would be any devices installed to control the VOC emissions from the tanks or during transfer of diesel into the tanks. The application does not provide the diesel refueling frequencies. Staff needs such information to verify the VOC emissions provided in Table 4.5-23.

DATA REQUESTS

23. Please clarify whether there would be any devices installed to control the VOC emissions from the diesel storage tanks and during transfer of diesel into the tanks. If yes, please provide any references to any air agency diesel fuel VOC control requirements and the control efficiency of the devices to be installed.
24. Please provide the diesel refueling frequencies.
25. Please provide detailed calculations with assumptions used to estimate the VOC emissions from the diesel storage tanks and during transfer of diesel into the tanks.

BACKGROUND: Cumulative Health Risk Impacts

The BAAQMD CEQA Guidelines for assessing cumulative health risk impacts recommend all sources of toxic air contaminants (TACs) within 1,000 feet of a proposed project to be evaluated. The SPPE application only analyzed the health risks of the project itself. Staff needs the cumulative health risks evaluation to complete the initial study.

DATA REQUEST

26. Please provide a cumulative TAC health risks analysis to include all sources of TACs within 1,000 feet of the proposed project.

BACKGROUND: Cumulative Criteria Pollutants Impacts

The application does not include a complete cumulative air quality modeling analysis for criteria pollutants. The cumulative analysis should include all reasonably foreseeable new projects with a potential to emit of 5 tons per year or more of criteria pollutants and located within a 6-mile radius of the proposed project. This includes all projects that have received construction permits but are not yet operational and those that are either in the permitting process or can be expected to be in permitting in the near future.

A complete criteria pollutant cumulative impacts analysis should identify all existing and planned stationary sources that affect the baseline conditions and consider them in the modeling effort. Staff needs a cumulative modeling analysis, or additional justification

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why an air quality cumulative modeling analysis is not needed for this project, to complete the staff analysis for cumulative air quality impacts.

DATA REQUESTS

27. Please justify why cumulative impact analysis for criteria pollutants was not done for the proposed project.
28. Please provide a list from the district of existing and planned cumulative sources located within 6 miles of the project site.
29. Please provide the list of sources to be considered in the cumulative air quality impact analysis.
30. Please provide the cumulative impact modeling analysis, including the proposed project and other identified new and planned projects within 6 miles of the proposed project site.

BACKGROUND: Electrical System Outages

The SPPE application does not provide reliability or outage frequency of the PG&E system in the vicinity of the project area. To explore the potential nature of emergency operations of the standby engines, staff needs to confirm and refine our understanding of PG&E's electrical system outages.

DATA REQUEST

31. Please provide information that reviews the frequency and durations of historic outages of the Metcalf - Edenvale 115 kilovolt (kV) line and related 230kV facilities that would be likely to trigger a total loss of service to the proposed project and lead to emergency operations of the diesel-powered generators. This response should identify the reliability of service historically provided by PG&E to other similar data centers in its service territory.

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BIOLOGICAL RESOURCES

BACKGROUND: Mitigation Monitoring and Reporting Plan and Supporting Technical Studies

Section 1.2 Prior Environmental Review of the SPPE application (TN 232466) states that a copy of the Mitigation Monitoring and Reporting Plan and supporting technical studies are located in Appendix K (TN 232467-3). However, these documents are not present in Appendix K or elsewhere in the SPPE application.

DATA REQUESTS

32. Please provide a copy of the Mitigation Monitoring and Reporting Plan that was approved by the City of San Jose.
33. Please provide a copy of the supporting technical studies.

BACKGROUND: Biological Resources Report and Surveys

Section 4.6 Biological Resources mentions that a copy of the Biological Resources Report by H.T. Harvey and Associates (November 2015) is located in Appendix B (TN 232467-1). However, this document is not present in Appendix B. In addition, the SPPE application does not mention or provide any recent documentation of biological resources surveys conducted within the past year for the proposed project. Staff needs more recent biological resources surveys to assess the current condition of the proposed project site.

DATA REQUESTS

34. Please provide a copy of the Biological Resources Report by H.T. Harvey and Associates (November 2015).
35. Please conduct a biological resources reconnaissance survey and provide an updated report documenting current site conditions.

BACKGROUND: Tree Survey Report

A Tree Survey Report by H.T. Harvey and Associates (November 2015) was provided in Appendix B of the SPPE application. A Tree Protection Plan provided in Appendix D (TN 232467-1) contains a report that includes an assessment of trees located on the west side of the project site and includes tree mitigation and tree preservation guidelines from a certified arborist. However, this report was prepared in September 2018 and does not document the current site conditions. In addition, Figure 2.3-3 (Tree Removal Plan, page 34) of the SPPE application shows trees not mentioned in the Tree Survey Report or Tree Protection Plan. Staff needs current and consistent information in order to determine which trees are currently present on site, and which will be removed, if any.

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DATA REQUEST

36. Please provide an updated report prepared by a Certified Arborist that documents current site conditions and identifies all trees to be preserved and removed.

BACKGROUND: Tree Removal

Figure 2.3-3 (Tree Removal Plan, page 34) shows several trees that will be removed. Trees marked 15 and 19 are located approximately where tree X is located on the Tree Assessment Map (located at the end of Appendix D). Section 2.3.2.5 (Landscaping) (TN 232466) states that an amendment to the special use permit issued by the City of San Jose will include an additional six trees to be removed (one on-site and five off-site) beyond the 13 already removed, and Section 4.6 Biological Resources (TN 232466, page 105) states no additional tree removal beyond the 13 trees already removed would occur. These two sections provide conflicting information. Section 3.7 Project-Related Approval, Agreement, and Permits of the SPPE application lists a Tree Removal Permit as one of the City of San Jose approvals, however this permit is not included in the application.

DATA REQUESTS

37. Does Figure 2.3-3 reflect the most up to date and current conditions for the proposed project including tree removal? If not, please provide a revised figure.
38. Please explain the discrepancy between Section 2.3.2.5 (Landscaping) and Appendix D.
39. Please provide a copy of the Tree Removal Permit, if available.

BACKGROUND: Approved and Submitted Documents and Fees

Page 103 of the SPPE application states "a Habitat Plan application was completed and submitted to the City, and all fees were paid prior to issuance of grading permits". Page 108 of the SPPE application (TN 232466) mentions land cover and nitrogen deposition fees paid in 2018 prior to obtaining the grading permit. Staff needs to review these documents as part of the CEQA review process and per the requirements of the Santa Clara Valley Habitat Plan (SCVHP). These documents provide a timeline of what documents and mitigation has been provided, approved, or completed.

DATA REQUESTS

40. Please provide a copy of the Habitat Plan application submitted to the City of San Jose.
41. Please provide a copy of the document that shows what fees are required by the City of San Jose and the SCVHP.

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42. Please provide copies showing proof that land cover and nitrogen deposition fees were paid.

BACKGROUND: Agency Communication and Contacts

Section 7.0 of the SPPE application provides contact information for the City of San Jose Department of Planning, Building and Code Enforcement. However, there is no mention or documentation of contacting federal or state wildlife agencies.

DATA REQUEST

43. Please provide documentation and contact information for any federal, state, or local agency communications regarding biological resources for this proposed project.

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CULTURAL/TRIBAL CULTURAL RESOURCES

BACKGROUND

Assessment of potential impacts on cultural and tribal cultural resources hinges in part on knowing the extent and character of ground-disturbing activities associated with a project. This includes the ingress and egress required during construction, especially of vacant, ungraded properties.

DATA REQUESTS

44. Describe construction access points, including the street(s) from which construction personnel and equipment would access the subject property. Please include the estimated depth and horizontal extent of excavation to create construction ingress/egress. Also show ingress and egress on a map similar to Figure 2.2-1 in the application.
45. Figure 2.3-5 of the application depicts an underground storm water detention basin beneath the proposed parking lot. How deep would excavation proceed in order to install the underground storm water detention basin? Please provide the depth with reference to the current grade/ground surface.

BACKGROUND

The application states that five new, 21-kV distribution feeders would extend from the Santa Teresa Substation along Via Del Oro to the project site (DJP&A 2020, pages 19, 31). The previous (2017) initial study/mitigated negative declaration (IS/MND) analyzed two such distribution feeders, both planned as underground utilities (DJP&A 2020, Appendix K). It is unclear whether the current proposal of five distribution feeders would be underground or aboveground utilities. Neither the application nor the previous IS/MND identify the depth or width of excavation required to install distribution feeders in either a two-feeder or five-feeder configuration. Finally, the distribution feeders' route is not shown on a map.

DATA REQUESTS

46. Please identify whether the five new distribution lines would be installed underground, aboveground, or some combination of both.
47. Describe the number of trenches, if applicable, proposed for installation of the distribution lines, as well as the length, width, and depth of excavation.
48. Map the route of the proposed distribution lines on a scaled figure.

BACKGROUND

The SPPE application states on page 109: *"The following discussion is based in part on [a] Cultural Resources Assessment completed by Albion Environmental, Inc.,*

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in October, 2018. A copy of the report will be submitted separately under Request for Confidential Designation". This report was submitted to CEC on April 13, 2020. The supporting documentation has not been provided to the CEC cultural resources staff. Independent analysis of the project cannot proceed without this vital information, as none of the contextual background information is included in the 2020 SPPE or the 2017 MND.

DATA REQUEST

49. Please provide copies of the reports and records of the literature search conducted for the Cultural Resources Assessment (Albion 2018, Appendix A: NWIC File No. 18-0257). Please ensure that the results include the 0.25 mile search area radius indicated on maps as provided by the Northwest Information Center (NWIC) or prepared by the consultant using shape files provided by the NWIC.

REFERENCES

- Albion 2018 — Albion Environmental, Inc. (Albion). Cultural Resources Assessment of Proposed Construction at APNs 706-02-053 and 706-02-054, and portions of 706-02-055 and 706-02-056, San Jose, California. Prepared for David J. Powers & Associates. October 2018.
- DJP&A 2020 — David J. Powers & Associates, Inc. (DJP&A). Small Power Plant Exemption Application. Great Oaks South Data Center. Submitted to the California Energy Commission. TN 232466. March 2020.

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HAZARDS AND HAZARDOUS MATERIALS

BACKGROUND: Fuel Tank Replenishment Strategies

The project consists of a single emergency generator package configuration. Each backup generator is fully independent of the others and would have its own dedicated fuel tank located on a skid beneath the generator. Each diesel engine would be readiness tested on a regular schedule, consuming only a small portion of its fuel each time.

DATA REQUEST

50. Please provide the fuel tank replenishment strategy and frequency, and the estimated frequency of fuel trucks needing to visit the facility for refueling.

BACKGROUND: Diesel Fuel Degradation Precautions

Stored diesel fuel is subject to degradation over time, which can render it unsuitable for use and potentially requiring it to be changed-out for fresh fuel.

DATA REQUEST

51. Please describe what measures are planned to maintain adequate quality of the stored fuel. Is the generator equipped with a fuel filtration system? How often might the stored fuel need to be changed out for new? If needed, how would this be accomplished? How many fuel truck visits would be required for the change out?

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UTILITIES AND SERVICE SYSTEMS

BACKGROUND: Water Supply Assessment

Sections 10910 et seq. of the California Water Code set forth the circumstances in which CEQA lead agencies must seek preparation of, or prepare themselves, water supply assessments (WSAs) for certain types of proposed projects. A fundamental task of a WSA is to determine whether total projected water supplies available during normal, single-dry, and multiple-dry water years will meet the projected water demand associated with a proposed project, in addition to the water supplier's existing and planned future uses. When making such a determination, the authors of the WSA must address several factors including information regarding existing water supplies, projected water demand, and dry year supply and demand. Suppliers are expressly permitted to rely on information contained in the most recently adopted Urban Water Management Plans (UWMPs), so long as the water needed for the proposed project was accounted for therein.

A WSA is required for staff to complete its analysis of the SPPE. The applicant did not submit a WSA along with the SPPE application. It should be noted that a WSA is not the same as the Water Supply Questionnaire that the applicant provided in Appendix I of the SPPE application.

DATA REQUESTS

52. Please provide a WSA that includes the components described above, particularly availability of water supplies for the purveyor to meet the project's demand in normal, dry, and multi-dry years.
53. In case of a shortage in any projected year, provide information on the water purveyor's plans to make up for those shortages.

BACKGROUND: Recycled Water

The policy of the state as well as the Energy Commission is to use potable water for the highest-value uses, such as drinking and other human sanitary uses. For other uses, such as industrial processes, lower quality waters such as brackish and recycled wastewater are highly encouraged. The proposed use of up to 1,000 AFY of potable water for cooling purposes could be considered unreasonable and wasteful. What makes it even more unreasonable is that potable water is proposed even when recycled water from the South Bay Water Recycling Program (SBWRP) is available in the project area. The reason stated by the applicant for not planning to use recycled water is the local water supplier, Great Oaks Water Company (GOWC), is not a member of the SBWRP, and that GOWC has no plans for joining the SBWRP to have access to recycled water. Even if recycled water were proposed, 1,000 AFY could still be considered unreasonable for this project in comparison with other comparable projects that use

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much less water. Staff would like to know if the applicant has pursued other options to get recycled water, and also other available cooling technologies that use less water.

DATA REQUESTS

54. Provide detailed explanation why the prospective water supplier will not join SBWRP to be able to get recycled water for the project
55. Provide information on pursuing other options to get recycled water for project use.
56. Provide detailed explanation why other, less water intensive, cooling technologies have not been considered.

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TRANSMISSION

BACKGROUND

Section 2.3 of the SPPE application indicates that the data center would be supported from the new PG&E Santa Teresa Substation. Staff requires a complete description of the both the GOSDC interconnection to the PG&E transmission grid and the reliability of the PG&E grid in order to understand the potential operation of the back-up generators.

DATA REQUESTS

57. Please provide a complete one-line diagram for the new PG&E Santa Teresa Substation. Show all equipment ratings including bay arrangement of the breakers, disconnect switches, buses, redundant transformers or equipment, etc. that would be required for interconnection of the GOSDC.
58. Please provide a detailed description and a one-line diagram showing how the GOSDC would be connected to the Santa Teresa Substation. Please label the name and voltage of the lines and feeders that connect to the substation and the GOSDC.
59. Please provide the conductor name, type, current carrying capacity, and conductor size for the transmission lines and 21 kV line that would be required for interconnecting the GOSDC and the Santa Teresa Substation.
60. Please provide the 21 kV supply line route, length and supporting structure configurations and measurements.
61. Please describe whether a loss of the 115 kV line on either side of the Metcalf or Edenvale Substation could cause a loss of service to the proposed data center.
62. Please describe whether the proposed data center load could be fully supplied through either the proposed Metcalf - Santa Teresa 115 kV or from the proposed Edenvale – Santa Teresa 115 kV line.

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TRANSPORTATION

BACKGROUND: Calculation of Project Vehicle Miles Travelled (VMT) Using the San Jose VMT Evaluation Tool

In accordance with Senate Bill 743, San Jose City Council Policy 5-1 requires proposed projects to use the city's online VMT Evaluation Tool to estimate project VMT. The VMT estimate is generated using project specific information such as accessors parcel number, building square footage by use (e.g., industrial, office), and automobile and bicycle parking spaces. If the project's estimated VMT exceeds the city's industrial or office VMT threshold then a combination of Tier 1 (project characteristics), Tier 2 (multimodal network improvements), and Tier 3 (parking) VMT reduction strategies should be applied to reduce VMT below the established threshold. If the estimated project VMT still exceeds the City of San Jose's established VMT threshold following the application of Tier 1, 2, and 3 VMT reduction strategies then Tier 4 transportation demand management (TDM) programs should be applied to reduce the project's VMT below the threshold or to the greatest extent possible. Some of these VMT reduction strategies require coordination and/or negotiations with the City of San Jose and others for implementation (San Jose 2018a).

DATA REQUESTS

63. In consultation with the City of San Jose, please submit a Transportation analysis utilizing a VMT calculation methodology that is consistent with city policy.
64. If necessary following consultation with the City of San Jose, please identify and submit project design modifications and/or TDM measures that would reduce project VMT per employee below all applicable significance thresholds or to the maximum extent possible.

REFERENCES

San Jose 2018a – City of San Jose (San Jose). San Jose Transportation Analysis Handbook. Available online at: <https://www.sanjoseca.gov/your-government/departments-offices/transportation/planning-policies/vehicle-miles-traveled-metric>

San Jose 2018b – City of San Jose (San Jose). City Council Transportation Analysis Policy 5-1 (Council Policy). Approved by Council Action February 27, 2018 by Resolution No. 78520. Effective date March 29, 2018. Available online at: <https://www.sanjoseca.gov/your-government/departments-offices/transportation/planning-policies/vehicle-miles-traveled-metric>