

DOCKETED	
Docket Number:	20-SPPE-01
Project Title:	Great Oaks South Backup Generating Facility Small Power Plant Exemption
TN #:	237631
Document Title:	Record of Conversation with J Zielkiewicz, BAAQMD staff regarding emergency Operations
Description:	N/A
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PROJECT TITLE: Great Oaks South Backup Generating Facility		Docket: 20-SPPE-01	
TECHNICAL AREA(s): Air Quality/Public Health			
<input type="checkbox"/> Telephone	<input checked="" type="checkbox"/> Email	<input type="checkbox"/> Meeting Location: N/A	
NAME(s):	Joseph Hughes, Air Resources Supervisor	DATE:	12/04/2020, 12/18/2020
WITH:	Jakub Zielkiewicz, Advanced Projects Advisor, Bay Area Air Quality Management District		
SUBJECT:	Back-up Diesel Engine Operations (non-testing/non-maintenance) Data		

COMMENTS:

This report of conversation documents an e-mail exchange between Jakub Zielkiewicz, Advanced Projects Advisor at Bay Area Air Quality Management District (BAAQMD) and Joseph Hughes (CEC staff) regarding clarifications of the backup generator usage data during non-testing/non-maintenance operations at a number of South Bay data centers. The data was included in the BAAQMD’s comment letter (TN235803) on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Great Oaks South Backup Generating Facility (Project). CEC staff asked follow-up questions for more details concerning the data. BAAQMD staff provided responses to CEC staff’s follow-up questions.

The e-mail exchange is attached.

cc:	Signed:
	_____ s _____
	Name: Joseph Hughes, Air Resources Supervisor

Brewster Birdsall

From: Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Sent: Friday, December 18, 2020 9:18 AM
To: Lesh, Geoff@Energy; Payne, Leonidas@Energy
Cc: Brewster Birdsall; Qian, Wenjun@Energy; Jiang, Tao@Energy
Subject: Fw: Back-up Diesel Engine Operations (non-testing/non-maintenance) Data
Attachments: CEC request_updated non-testing non-maintenance data.pdf

See responses to our questions below and the attached updated data set. I haven't had a chance to go through the data yet but wanted to forward this on.

Joey

From: Jakub Zielkiewicz <jzielkiewicz@baaqmd.gov>
Sent: Friday, December 18, 2020 9:03 AM
To: Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Cc: Pamela Leong <PLeong@baaqmd.gov>; Henry Hilken <HHilken@baaqmd.gov>; Alexander Crockett <ACrockett@baaqmd.gov>
Subject: RE: Back-up Diesel Engine Operations (non-testing/non-maintenance) Data

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Hi Joey,

Below in red are the Air District's responses to your questions. The attached is updated data for the non-testing/non-maintenance operations. Let me know if you have any questions and if you'd like to discuss.

Thanks,

Jakub

From: Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Sent: Friday, December 4, 2020 10:30 AM
To: Jakub Zielkiewicz <jzielkiewicz@baaqmd.gov>
Subject: Back-up Diesel Engine Operations (non-testing/non-maintenance) Data

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Good morning, Jakub,

I hope you had a good holiday break. Thanks again for providing the data on engine operation during non-testing/non-maintenance activities. We've been filtering through the data and have several questions. I know the data gathering effort is a work in progress and some of the data still needs to be processed and completed. Here are some initial questions/comments we have:

1. Are you guys working on completing the data set?
Yes, we're continuing to work with facilities to clarify and complete the data set. The updated attachment reflects recently received updates.
2. Can the service territory (i.e., SVP or PG&E) for each facility be provided/included?
Yes. Please see the attachment reflecting city of operation.
3. A handful of operations that were listed for reasons other than readiness testing/maintenance or the heat events appear to be in fact due to the heat events.
The information presented is a synthesis of the information that's been conveyed to us.
4. Can you describe how the determination for the explanation of non-testing/non-maintenance operation is made?
Non-testing/non-maintenance includes operations of the generators that are not subject to the limits on hours of operation pursuant to the Air District issued permit.
5. Can you confirm the total number of data centers under BAAQMD's jurisdiction?
Based on a search of our permit database, we understand that there are 66 data center facilities permitted in the Bay Area.
6. Can you confirm the total number of data centers visited for this data collection effort (including facilities that had no engine run hours)?
We received data from 45 facilities.
7. Can you include the total number of permitted engines or total capacity for each data center (did all the permitted engines run for some time or just part of them ran and only those engines are included in the data)?

For each data center in the data sample provided, please find the relevant information in the table below:

Data Center	# of Permitted Engines	# of Engines with Non-Testing/Non-Maintenance Operations	Total Capacity of Permitted Engines	Total Capacity of Engines Operated in Non-Testing/Non-Maintenance
1	10	10	20MW	20MW
2	5	5	11MW	10MW
3	6	6	14MW	12.75MW
4	44	44	110MW	99MW
5	3	2	7MW	4MW
6	6	6	14MW	12MW
7	24	24	54.5MW	54.5MW
8	26	24	57MW	48MW
9	5	5	9MW	8.23MW

10	41	40	126MW	110.93MW
11	14	11	27MW	18.46MW
12	11	11	22MW	20.23MW
13	5	5	9MW	7.75MW
14	22	8	59.4MW	21.6MW
15	8	7	17.5MW	15MW
16	17	4	29MW	7MW
17	2	2	4MW	4MW
18	8	6	16MW	12MW
19	6	6	10MW	9MW
20	25	17	70.1MW	51MW

Thanks,
Joey