

**DOCKETED**

<b>Docket Number:</b>	20-SPPE-03
<b>Project Title:</b>	Gilroy Backup Generating Facility
<b>TN #:</b>	239662
<b>Document Title:</b>	Data Requests Set 3
<b>Description:</b>	CEC staff data requests for the applicant
<b>Filer:</b>	Lon Payne
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	9/10/2021 11:45:48 AM
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September 10, 2021

Amazon Data Services, Inc.  
C/O Scott A. Galati  
1720 Park Place Drive  
Carmichael, California 95608

**Data Requests Set 3 for Gilroy Backup Generating Facility (20-SPPE-03)**

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 3, which is necessary for staff analysis of the Gilroy Backup Generating Facility (GBGF) and associated Gilroy Data Center (GDC), collectively the "project" under the California Environmental Quality Act (CEQA). This Data Request Set 3 seeks further information in the areas of air quality, hazards and hazardous materials, and transportation, based on the contents of the application and revisions submitted thus far. Staff may submit subsequent data requests in these and other resource areas, based on further information received or necessary for a complete analysis of the project.

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 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 [leonidas.payne@energy.ca.gov](mailto:leonidas.payne@energy.ca.gov).

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/S/

Leonidas Payne  
Project Manager

Enclosure: Data Requests Set 3

# **GILROY BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3**

## **AIR QUALITY AND PUBLIC HEALTH**

### **BACKGROUND: REVISED CONSTRUCTION EMISSIONS CALCULATIONS**

The Revised Project Description (TN 239193) for the addition of two battery energy storage system (BESS) facilities appears to increase: the ground disturbance area (acres); excavated and trenching material movement volume (cubic yards); and also the number and types of off-road equipment and haul trucks necessary to deliver and install BESS components. Staff needs to confirm that the newly proposed construction activities related to the BESS facilities were reflected accurately in the construction emission calculations that appear in the Revised Air Quality Impact Assessment (AQIA) (TN 237353) that was submitted on March 30, 2021, prior to proposing the BESS. The site plan with the Revised Project Description shows an additional five acres of ground disturbance, based on two areas covering approximately 2.5 acres each (286 feet x 379 feet and 286 feet x 380 feet).

### **DATA REQUEST**

46. Please confirm that the disturbance area, material movement, and equipment and trucking fleet necessary to install the two proposed BESS facilities are accurately reflected in the project construction emissions and construction phase air dispersion modeling analysis. This response should describe whether the applicant finds it necessary to update the construction emissions estimates and air dispersion modeling analysis, and if not, a demonstration of how the BESS components are within the scope of the earlier construction-phase analysis.

# **GILROY BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3**

## **HAZARDS AND HAZARDOUS MATERIALS**

### **BACKGROUND**

On page 15, the Revised Project Description states that lithium-ion cells would be the basis of the BESS. However, the exact chemistry of the lithium-ion battery has not been provided.

### **DATA REQUEST**

47. Provide a safety data sheet for the proposed battery technology.

### **BACKGROUND**

On page 15, the Revised Project Description states the batteries would be housed either in a purpose-built battery container or in an outdoor enclosure with appropriate environmental controls.

### **DATA REQUEST**

48. Please provide a written description of what the BESS enclosure would be and clarify how maintenance would be conducted on the BESS enclosures.

### **BACKGROUND**

On page 16, the project design for the BESS calls for each cell to contain a fire detection system to monitor operational environment for smoke and fire components and safely shut down the BESS in emergency situations. The fire safety system would meet all federal and state standards and the BESS facilities would comply with NFPA 855, IEEE 1547, and UL (9540, 9540A, 1741SA, 1973).

### **DATA REQUESTS**

49. Please provide a written description of the fire protection system for each BESS enclosure.

50. Please describe how thermal runaway protection would be enacted on the lithium-ion BESS.

51. Please describe how the fire department would gain access to each BESS during an emergency event such as a fire.

52. Please describe and locate a water supply and any fire hydrants near the lithium-ion BESS enclosures.

# **GILROY BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 3**

## **TRANSPORTATION**

### **BACKGROUND**

CEQA Appendix G, Transportation, includes a question to determine if a proposed project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. According to the City of Gilroy 2040 General Plan, Mobility Chapter 3, "Figure M-2 Planned Bicycle Network", a Class II Bicycle facility is planned to go through the project site, from Camino Arroyo, south to Arroyo Circle.

### **DATA REQUEST**

53. Please provide confirmation from the City of Gilroy whether the project applicant would be required to construct a bicycle facility through the project site or another alternative. If construction of a bicycle facility is required, please provide details describing and illustrating the location, the necessary construction activities required by the City, and the estimated duration of construction.

### **REFERENCES**

Gilroy 2020 – City of Gilroy (Gilroy). City of Gilroy 2040 General Plan. Adopted on November 2, 2020. Accessed on April 11, 2020. Available online at: <https://www.cityofgilroy.org/DocumentCenter/View/11309/Gilroy-2040-General-Plan-39-MB?bidId=>