

DOCKETED

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Document Title:	Data Requests Set 6
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**CALIFORNIA
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May 20, 2022

Digital Realty
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 6 for Lafayette Backup Generating Facility (20-SPPE-02)

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 6, which is necessary for a complete staff analysis of the Lafayette Backup Generating Facility (LBGF) and associated Lafayette Data Center (LDC), 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 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.

/S/

Leonidas Payne
Project Manager

Enclosure: Data Requests Set 6

LAFAYETTE BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 6

TRANSPORTATION

BACKGROUND: SAN JOSE CITY AIRPORT STAFF COMMENTS ON THERMAL PLUME ANALYSIS

On July 3, 2020, California Energy Commission (CEC) staff issued Data Request, Set 1. Included were Air Quality data requests 64 through 67, which requested additional information and data related to the project's emergency diesel generators and rooftop chillers thermal and visible plumes. In August 2020, the applicant filed data responses in four separate filings (Part 1 TN 234295, Part 2 TN 234294, Part 3 TN 234293, and Supplemental Response TN 234531) to address staff Data Requests, Set 1. The applicant's data response Part 1 stated that a thermal plume analysis would be submitted under separate cover during the first week of September 2020.

On May 4, 2022, the applicant submitted the thermal plume analysis under TN 242932.

On May 6, 2022, CEC staff contacted city of San Jose and Santa Clara County airport planning staff regarding their review of the project's revised "below-grade" emergency diesel generator drawings and thermal plume analysis.

On May 11, 2022, in response to the applicant's thermal plume analysis filing city of San Jose Airport Planner, Ryan Sheelen, informed CEC staff that he had concerns with the project's thermal plume analysis because the plumes must be analyzed against aircraft on departure procedures, arrival procedures and general aviation aircraft in the airport's traffic pattern which routes over the project site. He stated that the applicant's submitted analysis references Australian aviation documents and guidance, which is not acceptable. He explained the Federal Aviation Administration (FAA) released Draft Advisory Circular (AC) 150/5190-4B Airport Land Use Compatibility Planning. The draft AC, under 2.2.2.8.2 Atmospheric Interference, states when evaluating the potential impact of the exhaust plume(s), airport owners/operators, should consider the traffic pattern, approach and departure corridors, and existing or planned flight procedures. It also features the FAA's official endorsement of the MITRE Corporation (MITRE) Exhaust Plume Analyzer model. Mr. Sheelen requested a revised thermal plume analysis that follows the FAA's guidance using the MITRE model and considers the airport's existing flight pattern, approach and departure corridors, and existing or planned flight procedures (TN 243150).

DATA REQUEST

141. Prepare and submit a supplemental thermal plume analysis that follows the FAA's guidance using the MITRE model and considers the airport's existing flight patterns, approach and departure corridors, and existing or planned flight procedures.

LAFAYETTE BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 6

REFERENCES

- Federal Aviation Administration. Draft Advisory Circular 150/5190-4B, Airport Land Use Compatibility Planning, June 22, 2021. Available online at:
https://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.information/documentID/1
- Federal Aviation Administration. Memorandum: Technical Guidance and Assessment Tool for Evaluation of Thermal Exhaust Plume Impact on Airport Operations. September 24, 2015. Available online at:
https://www.faa.gov/airports/environmental/land_use/media/technical-guidance-assessment-tool-thermal-exhaust-plume-impact.pdf
- MITRE Corporation. Exhaust Plume Analyzer. Available online at:
<https://www.mitre.org/research/technology-transfer/technology-licensing/exhaust-plume-analyzer>