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**CALIFORNIA
ENERGY COMMISSION**



October 28, 2022

GI Partners
C/O Scott A. Galati
1720 Park Place Drive
Carmichael, California 95608

Data Requests Set 1 for Bowers Backup Generating Facility (22-SPPE-01)

Dear Scott Galati:

Pursuant to California Code of Regulations, Title 20, sections 1941 and 1716, the California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests Set 1, which is necessary for the staff analysis of the Bowers Backup Generating Facility (BBGF) (22-SPPE-01). The BBGF would include the Bowers Data Center (BDC), the BBGF, and related utility infrastructure, which together constitute the "project" under the California Environmental Quality Act. This Data Requests Set 1 seeks further information in the areas of air quality and greenhouse gas emissions, cultural and tribal cultural resources, geological and paleontological, land use, population and housing, project description, and transportation based on the contents of the application submitted thus far. Staff may submit subsequent data requests in these and other resource areas based on further information received or as 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, object to providing the requested information, or need to revise the timeline, please send written notice to me and the Committee within 20 days of receipt of this letter. The written notification must contain the reasons for not providing the information, the grounds for any objections, or reason(s) for the need to revise the timeline (see Cal. Code Regs., tit. 20, § 1716 (f)).

If you have any questions, please email me at ann.crisp@energy.ca.gov.

Ann Crisp
Project Manager

Enclosure: Data Requests Set 1

**BOWERS BACKUP GENERATING FACILITY SPPE
DATA REQUESTS SET 1**

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BOWERS BACKUP GENERATING FACILITY SPPE DATA REQUESTS SET 1

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Authors: Ann Chu, Tao Jiang, and Wenjun Qian

BACKGROUND: Air Quality District Application

The proposed project would require a permit from the Bay Area Air Quality Management District (BAAQMD). For purposes of inter-agency consistency, staff needs copies of all correspondence between GI Partners (applicant) and the BAAQMD in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

DATA REQUESTS

1. Please provide copies of all substantive correspondence between the applicant and BAAQMD regarding the project, including application and e-mails, within one week of submittal or receipt. This request is in effect until staff publishes the environmental document.
2. Please identify the current schedule for the BAAQMD permit application submittal. Please submit a copy of that application to the docket when it is submitted to BAAQMD.

BACKGROUND: Screening for Low-load Conditions

The air quality impact analysis in the small power plant exemption (SPPE) application (TN 245769, p. 76) indicates that testing of the engines can occur over a range of load conditions. However, the analysis says that "an air quality screening analysis was not performed," and "...the worst-case stack condition and the worst-case engine location could be determined from the screening analysis" (TN 245769, p. 76). Staff needs a detailed description of the types of testing and maintenance scenarios, the frequency of full-load tests and low-load tests, and confirmation of impacts at various standby engine load points to verify the assumptions used in the SPPE analysis.

The applicant assumed that the 100 percent load case would produce the maximum ground-based concentrations (TN 245769, p. 76). In calculating the nitrogen oxides (NO_x) emissions for the 100 percent load case, the applicant assumed a warm-up period of 0.25 hour (15 minutes) for the selective catalytic reduction (SCR) to become effective. For lower load cases (e.g., 100, 75, 50, 25, and 10 percent load), it may take more time for the SCR to warm up. Staff needs to confirm whether the NO_x emissions during lower load cases would be lower than those estimated for the 100 percent load case. If a Tier 4 emission factor is assumed for part of the hour for these load cases, the applicant needs to provide documents/certificates from the SCR vendor to verify the warm-up period of the SCR to reach Tier 4 emission rates for these load cases.

In addition, lower exhaust temperatures and slower exhaust velocities at lower loads

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could result in higher ground-level concentrations, even if the mass emissions would be lower. Without modeling, staff would not be able to confirm whether the ground-level impacts for the lower load cases would be lower than those for the 100 percent load case.

DATA REQUESTS

3. Please provide a detailed description of the testing and maintenance frequencies and standby engine load points for the Cummins QSK95 engines. The description should include the length and engine load points for each weekly, monthly, quarterly, and annual testing and maintenance event.
4. Please provide NO_x emission calculations for the representative range of engine load points (e.g., 100, 75, 50, 25, and 10 percent load). If a Tier 4 emission rate is assumed for part of the hour for these load cases, please provide documents/certificates from the vendor to verify the warm-up period of the SCR to reach Tier 4 emission rates for these load cases.
5. Please provide a screening review of short-term (1-hour) ambient air quality impacts during testing for a representative range of engine load points (e.g., 100, 75, 50, 25, and 10 percent load) to confirm that full-load testing would produce the highest ground-level concentrations.

BACKGROUND: Particulate Matter Emission Factor

Appendix AQ-1 in Appendix A of the SPPE application shows that the applicant assumed the emission factor for particulate matter (PM) of 10 micrometers or less in diameter (PM₁₀) and particulate matter of 2.5 micrometers and smaller in diameter (PM_{2.5}) to be 0.015 grams per brake horsepower-hour (g/bhp-hr). However, the MIRATECH performance warranty data (sent electronically from applicant to staff) shows that the target outlet PM₁₀ emission factor would be 0.02 g/bhp-hr. Staff needs to confirm the PM emission factor to make sure the PM impacts were not underestimated.

DATA REQUESTS

6. Please confirm which PM emission factor is correct and provide documentation of the correct emission factor.
7. If the PM emissions would be 0.02 g/bhp-hr, please revise the emissions calculation, criteria pollutant impact analysis, and health risk assessment accordingly.

BACKGROUND: Testing of Stacked Engines

The SPPE application states that the engines would be installed in a stacked configuration. The applicant assumed that the engines would be tested individually for

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up to one hour at any one time from 7 AM to 5 PM. Staff would like to verify that these assumptions would be made enforceable.

If the two engines in a stacked pair could be tested on the same day, the modeled emission rates from the shared stack should be doubled in evaluating the 24-hour average impacts for PM10, PM2.5, and sulfur dioxide (SO₂). The 8-hour carbon monoxide (CO) impacts would also be doubled if the engine pair would be tested within 8 hours. If two engines in a stacked pair would not be tested on the same day, staff would like to verify that such assumption would be made enforceable.

DATA REQUESTS

8. Please confirm that the applicant would request BAAQMD 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.
9. Please confirm that the applicant would request BAAQMD to require an enforceable limit that would allow testing of engines only between 7 AM to 5 PM daily.
10. Please confirm whether two engines in a stacked pair would be tested on the same day. If not, please confirm that the applicant would request BAAQMD to require an enforceable limit that would prevent testing of the two engines in the stacked pair on the same day.

BACKGROUND: Health Risk Assessment (HRA) for Volatile Organic Compounds (VOC) Emissions from Storage Tanks

On page 69 of the SPPE application (TN 245769), it is written that 'the engines will be stacked in pairs. Each engine pair will have a single 12,000-gallon [ultra low sulfur diesel] ULSD storage tank as well as a 500-gallon ULSD "day tank". The storage capacity of these two (2) tanks have been combined for purposes of VOC emissions estimates. Total fuel storage capacity will be 200,000 gallons. See Appendix AQ-1 for the tank VOC emissions estimates.' Also, in Table AQ1-3 in Appendix A (TN 245767), the applicant provided VOC-related air toxics emissions from ULSD storage tanks. Staff needs to verify if the VOC emissions from these tanks were included in the HRA.

DATA REQUEST

11. Please explain if the VOC emissions from these tanks were included in the HRA. If yes, please provide the detailed HRA modeling files. If no, please justify why these emissions were not included in the HRA.

BACKGROUND: Refrigerant Use in Air-Cooled Chillers

The SPPE application states that the project would use air-cooled chillers to provide cooling to the data center. However, it does not describe the type of refrigerant to be

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used in the chillers.

California Health & Saf. Code § 39730.5 requires the state to reduce hydrofluorocarbon (HFC) emissions 40 percent below 2013 levels by 2030 . The California Code of Regulations, Title 17, section 95375(c)(1) states that no person shall sell, lease, rent, install, use, or otherwise enter into commerce in the State of California regarding any end-use equipment or product manufactured after the effective date that does not comply with Table 3 (which includes chillers) of section 95374(c) of the subarticle, unless projects meets the exceptions stated under California Code of Regulations, Title 17, section 95375(c)(2).

In addition, on September 30, 2022, the Governor signed SB 1206¹, which prohibits a person from offering for sale or distribution, or otherwise entering into commerce in the state, bulk HFCs or bulk blends containing HFCs that exceed a specified Global Warming Potential (GWP) limit beginning January 1, 2025, and lower GWP limits beginning January 1, 2030, and January 1, 2033. However, the bill does not restrict the authority of the California Air Resources Board (CARB) to establish regulations lowering the maximum allowable GWP limit below the limits established by the bill.

Staff needs information regarding the refrigerant proposed to be used in the chillers to determine whether the use of the refrigerant would be prohibited. Given the restrictions established by SB 1206 and the potential for more stringent limits to be imposed by CARB in the future, staff needs to know how the proposed refrigerant would be initially charged, handled during maintenance and repair, and replenished after the sale and distribution prohibition timelines established in SB 1206. Staff also needs the carbon dioxide equivalent (CO_{2e}) emissions estimation due to annual refrigerant leakage to complete the greenhouse gas (GHG) emissions analysis.

DATA REQUESTS

12. Please identify the refrigerant proposed to be used in the air-cooled chillers.
13. Please explain how the use of the proposed refrigerant would be allowed under the HFC prohibition regulation.
14. Please explain how the proposed refrigerant would be initially charged, handled during maintenance and repair, and replenished after the sale and distribution prohibition timelines established in SB 1206.
15. Please provide an estimate of GHG emissions (as CO_{2e} emissions) due to annual refrigerant leakage and failure rates for the proposed air-cooled chillers.

¹ https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB1206

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BACKGROUND: Sulfur Hexafluoride Emissions

The project would include electrical equipment such as circuit breakers and transformers. The CARB adopted Amendments to the Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear on December 30, 2021, which became effective on January 1, 2022. Based on the amended regulation (Cal. Code Regs., tit. 17, § 95352), starting on the applicable phase-out dates, no person may acquire sulfur hexafluoride (SF₆) gas-insulated equipment (GIE) for use in California unless one of following provisions apply:

- a) An SF₆ phase-out exemption was approved by the Executive Officer, or SF₆ GIE were acquired in response to a failure, pursuant to section 95357.
- b) The SF₆ GIE device was present in California and reported to CARB pursuant to section 95355(a) for a data year prior to the applicable phase-out date listed in Table 1 or Table 2.
- c) The SF₆ GIE device was purchased by the GIE owner prior to the applicable phase-out date listed in Table 1 or Table 2 for the relevant GIE characteristics and enters California no later than 24 months after the purchase date.
- d) The SF₆ GIE manufacturer replaces a defective SF₆ GIE device under the terms of the manufacturer's warranty.

Staff needs to confirm whether SF₆ would be used in the circuit breakers and transformers of the project. Staff needs to confirm which of the four provisions the applicant would rely upon to comply with the current SF₆ phase out regulation (Cal. Code Regs., tit. 17, § 95352) and the applicable phase out date based on the proposed GIE characteristics. If SF₆ would not be used, staff needs information on the non-SF₆ alternative to be used in the circuit breakers and transformers. Staff needs an estimate of the leakage of SF₆ or non-SF₆ alternative from the electrical equipment to include in the GHG analysis.

DATA REQUESTS

16. Please confirm whether SF₆ would be used as the electrical insulator for any electrical equipment for the project.
17. Please provide the voltage and short-circuit current rating of the circuit breakers and transformers and determine the applicable SF₆ phase out date.
18. Please confirm which of the four provisions the applicant would rely upon to comply with the current SF₆ phase out regulation (Cal. Code Regs., tit. 17, § 95352).
19. If the applicant is going to use option c) of the provisions shown above, please confirm whether the proposed circuit breakers and transformers would be purchased before the applicable SF₆ phase-out date and enter California no later

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than 24 months after the purchase date, therefore, the project would be able to use SF₆ in the circuit breakers and transformers.

20. If SF₆ would not be used, please provide information on the non-SF₆ alternative to be used in the circuit breakers and transformers.

21. Please provide an estimate of the quantity used and the amount of annual SF₆/non-SF₆ alternative leakage.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Authors: Patrick Riordan and Cameron Travis

BACKGROUND: Description and Characterization of Excavation

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. The application provides little information about the depth of excavation required to demolish the existing improvements on the project site and to build the proposed project, indicating only that "The project would require excavation to depths of up to 16 feet" (TN 245769, pp. 115 and 136).

DATA REQUEST

22. Please describe and characterize the scale of excavation (particularly depth) required for various project components, including:

- a. Demolition of existing buildings and landscaping
- b. Site grading
- c. Installation of supporting generators
- d. Construction of data center building
- e. Landscaping
- f. Stormwater treatment features
- g. Recycled water pipeline extension
- h. Electrical substation
- i. Generator equipment yard
- j. Surface parking
- k. Utility interconnects
- l. Electrical distribution features (including transmission poles and interim power solution)

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BACKGROUND: Parcel Evaluation in Buffer

The SPPE application states that “the geographic area for cultural resources is the project site, recycled water line extension alignment, and adjacent parcels;” however, the application does not include adjacent parcels in its analysis of historic resources (TN 245769, pp. 120–121). Additionally, the reconnaissance survey for the Historical Resources Assessment only assessed the building at 2805 Bowers Avenue (TN 245765, Appendix C, p. 1). Staff is aware of at least seven adjacent parcels containing buildings or structures that are 45 years or older: the Uranium Substation at 2747 Bowers Avenue, the parcels at 2810 Bowers Avenue, 2855 Bowers Avenue, 2800 Kifer Road, 2800 Mead Avenue, 2820 Northwestern Parkway, and 2551 Walsh Avenue (City of Santa Clara 2022). CEC cultural staff applies a minimum one-parcel built environment study area as the Project Area of Analysis for urban projects.

DATA REQUEST

23. Please provide an evaluation of all parcels within a one-parcel buffer from the project site or the recycled water line extension alignment that have structures, buildings, or objects that are 45 years or older on California Department of Parks and Recreation 523 series forms for their eligibility for listing on the California Register of Historical Resources or as a local landmark.

REFERENCES

City of Santa Clara 2022 – City of Santa Clara (Santa Clara). City of Santa Clara Search for Permits. Available at: <https://aca-prod.accela.com/SANTACLARA/Cap/CapHome.aspx?module=Building&TabName=Building> , accessed September 22, 2022.

SPPE Application 2022 – SPPE Application, TN 245765 – Historical Resource Assessment for the Walsh Bowers Data Center Project, City of Santa Clara, Santa Clara County, California. Appendix C BBGF SPPE App Appendices B-E Part 1. 22-SPPE-01. August 5, 2022.

GEOLOGICAL AND PALEONTOLOGICAL RESOURCES

Author: Michael Turner

BACKGROUND: Subsurface Geotechnical Soil Properties

Appendix D of the SPPE application includes a Soil Report generated from the Natural Resources Conservation Service’s website. Natural Resources Conservation Soil Reports do not provide sufficient subsurface geotechnical soil properties to determine the potential of site-specific geologic hazards such as the potential for liquefaction, the presence of expansive materials, or the lateral and vertical extent of undocumented fill material at the site. This information is necessary for staff to complete their analysis.

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DATA REQUESTS

24. Provide site-specific subsurface geotechnical soil information.
25. Provide any adverse soil conditions present including, but not limited to, liquefaction potential, the presence of expansive soils, and the presence of existing fills at the site.
26. If such adverse soil conditions are present, provide the maximum depths of disturbance for each of the possible foundation solutions noted in Section 3.7.2.1 (mat slab, soil-mixed columns, and drilled displaced piers).

BACKGROUND: Potential Fossil Yield Classification Ranking

In the SPPE application, Section 3.7.1.2, Paleontological Resources, the applicant referenced the City of Santa Clara Draft General Plan, dated January 2011, page 328, and noted,

“The site is situated on alluvial fan deposits of the Holocene age. These sediments have low potential to yield fossil resources or to contain significant nonrenewable paleontological resources. However, these recent sediments overlie sediments of older Pleistocene age sediments with high potential to contain paleontological resources. These older sediments, often found at depths of ten feet or more below the ground surface, have yielded the fossil remains of plants and extinct terrestrial Pleistocene vertebrates. Ground disturbing activities of ten feet or more have the potential to impact undiscovered paleontological resources in older Pleistocene sediments.”

In addition to the information provided, the potential for paleontological resources to occur in the project area should also be evaluated using the federal Potential Fossil Yield Classification (PFYC) system developed by the Bureau of Land Management (BLM 2016). Because of its demonstrated usefulness as a resource management tool, the PFYC has been utilized for many years for projects across the country, regardless of land ownership. It is a predictive resource management tool that classifies geologic units based on their likelihood to contain paleontological resources on a scale of 1 (very low potential) to 5 (very high potential) or Unknown. This system is intended to aid in predicting, assessing, and mitigating impacts to paleontological resources.

DATA REQUEST

27. Provide the PFYC ranking for the project site.

REFERENCES

BLM 2016 – Bureau of Land Management (BLM). Potential Fossil Yield Classification System: BLM Instruction Memorandum No. 2016-124. July 8, 2016. Accessed on September 22, 2022. Available online at: <https://blm.gov/policy/im-2016-124>

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LAND USE

Author: Andrea Koch

BACKGROUND: City of Santa Clara General Plan Amendment and Minor Modification

In the SPPE application, the applicant stated that the City of Santa Clara recommended that the applicant apply for a General Plan amendment to make the project site's General Plan land use designation consistent with the zoning designation. The applicant would apply to change the General Plan land use designation from High Intensity Office/R&D to Light Industrial for consistency with the Light Industrial zoning designation. The applicant also stated that the project would need to obtain a minor modification from the City of Santa Clara to increase the project height above the maximum of 70 feet allowed by the Light Industrial zoning designation.

DATA REQUESTS

28. Please discuss the planned approximate timeline of the General Plan amendment process.
29. Please discuss the planned approximate timeline of the minor modification process to increase the allowed height above the maximum of 70 feet permitted in the Light Industrial zoning district.
30. Please provide copies of any written communications with the City of Santa Clara about these issues if available.

POPULATION AND HOUSING

Author: Ellen LeFevre

BACKGROUND: Project Construction

Staff needs to know more about the construction of the BDC and BBGF, collectively "the project." The SPPE application notes on page 16 that construction of BBGF is expected to take 6 months and require 10–15 construction workers including one crane operator. The SPPE application notes on page 26 that demolition, grading, excavation, and construction activities are estimated to last approximately 24 months and the "construction workforce is estimated to have a peak number of workers of approximately 125 per month and an average of approximately 100 per month". Staff has the following associated questions and requests:

DATA REQUEST

31. What is the estimated number of construction workers during peak activities and on average for the whole project (BBGF and BDC)?

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BACKGROUND: Project Construction and Operation Workforce

Staff needs to know about the assumptions used for the construction and operations workforce for the project. No assumptions were discussed in the SPPE application.

DATA REQUESTS

32. What is the estimated number of operations workers for the project (BBGF and BDC)?
33. Are the estimated project construction and operation workers expected to be derived from locally within the Greater Bay Area or non-locally (beyond a two-hour commute of the project site)?
34. What portion of the construction and operation workforce does the applicant anticipate would be local and what portion would be non-local?

PROJECT DESCRIPTION

Authors: Ann Crisp and Laiping Ng

BACKGROUND: Recycled Water Line Extension Alignment

According to the SPPE application, per Section 2.3.8, the project would construct a 2,600-foot recycled water line extension to connect to the existing recycled water pipeline located at the intersection of Walsh Avenue and Northwestern Parkway. The recycled water line extension is shown on Figure 2.13 but is not shown on other relevant project figures, including Figure 2.2 (Vicinity Map), Figure 2.3 (Aerial Photograph and Surrounding Land Uses), and Figure 2.4 (Site Plan).

DATA REQUEST

35. Please provide revised figures, Figure 2.2 (Vicinity Map), Figure 2.3 (Aerial Photograph and Surrounding Land Uses), and Figure 2.4 (Site Plan), that depict the recycled water line extension route.

BACKGROUND: Construction Staging and Parking

The SPPE application Section 2.3.4 provides information on the timing and duration of demolition, grading, excavation and construction activities. Staff requires additional information on the location of worker parking as well as material laydown and staging areas.

DATA REQUEST

36. Please provide additional information on whether all construction parking and material laydown and staging areas would occur on the site for all phases of the project, including demolition, site grading, excavation, and construction. If not,

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please provide a description of the location and a map of any off-site parking and material laydown and staging areas.

BACKGROUND: Project Interconnection and System Reliability

The SPPE application Section 2.3 indicated that the BDC includes an onsite new substation with three electrical supply lines that would connect to the Silicon Valley Power (SVP) Uranium Substation. Staff requires a complete description of the BDC interconnection to the SVP system to understand how the interconnection would affect the potential operation of the back-up generators.

DATA REQUESTS

37. Please provide complete one-line diagrams for the new project 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 BDC.
38. Please provide a detailed description and one-line diagrams of the Uranium Substation with the interconnection of the BDC. Please label the name of the lines and provide the line voltages and SVP loop information.
39. Please provide for the 60 kilovolt (kV) loop on the SVP system that would serve the BDC:
 - a. A physical description
 - b. The interconnection points to SVP service
 - c. The breakers and isolation devices and their use protocols
 - d. A list of other connected loads and type of industrial customers
 - e. A written description of the redundant features that allow the system to provide continuous service during maintenance and fault conditions
40. Please provide the pole configurations which would be used to support the overhead transmission lines from the SVP 60 kV system to the BDC. Show proposed pole structure configurations and measurements.
41. Please provide a detailed description and drawing of the proposed 60 kV transmission line route, length, possible interconnection points to the existing SVP system, and possible pole locations. Please provide a legend and label the drawing to show the proposed line route, pole locations and the existing transmission facilities.

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42. Please describe any past outages or service interruptions, including Public Safety Power Shutoffs (PSPS), on the 60 kV systems that would serve the proposed BCD. Based on these prior events, please also provide the following:
- a. Describe any equipment upgrades or operational changes implemented by SVP to reduce the likelihood of a repeat of the events that led to an outage.
 - b. Describe the responses to the outage(s) by any existing data centers (i.e., initiated operation of some or all backup generation equipment, data off-shoring, data center shutdown, etc.)?
43. How would local and regional PSPS events be implemented on the 60 kV system compared to PSPS events on the 115 kV system (in other words, would a customer who is extremely concerned about reliability prefer one system over another)?
44. Please provide the follow in regard to PSPS events:
- a. Please describe how, if historical PSPS events were to occur, the emergency operations of the generators at the proposed project would be engaged?
 - b. Have there been any changes to the SVP system, since PSPS events began, that would affect the likelihood that future PSPS events would result in the operation of emergency generators at the proposed project?

TRANSPORTATION

Author: Ashley Gutierrez

BACKGROUND: Thermal Plume Analysis

According to the SPPE application, the project would have emergency generators and air-cooled chillers and the project site is located 1.87 miles west of the Norman Y. Mineta San Jose International Airport. Therefore, staff will require the following information in order to complete its evaluation of thermal plumes from the proposed BBGF emergency generators and the BDC building and server chilling units to ensure air traffic safety and analyze any potentially significant impacts from such plumes.

DATA REQUESTS

45. Please perform a thermal plume modeling of the project's emergency generators for the BBGF and provide modeling files with all calculations embedded in.
46. Please perform thermal plume modeling of the equipment used to cool the building and data servers at the BDC and provide modeling files with all calculations embedded in.

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47. Please describe in detail the Heating Ventilation Air Conditioning equipment, including the chiller units, with enough detail to confirm the thermal plume modeling.
48. Please provide a schematic, showing all mechanical equipment on the roof of the BDC.
49. Please provide the following to support the thermal plume analysis (provide equivalent data if necessary):
 - a. Stack Height (meters) for the BDC chiller units and BBGF emergency engines
 - b. Exhaust Temp (Kelvin) for both the chiller units and emergency engines
 - c. Exit Velocity (meter per second) for both the chiller units and the emergency engines
 - d. Stack Diameter (meters) for the chiller units and the emergency engines
 - e. Number of chiller unit stacks
 - f. Arrangement and distance between the chiller unit stacks (meters)

UTILITIES AND SERVICE SYSTEMS

Author: James Ackerman

BACKGROUND: Cumulative Impacts

In the SPPE application, Section 3.19.2.1 Project Impacts, under cumulative impact **UTL-C**, within the paragraph entitled Electricity, Natural Gas, and Telecommunication Services, an impact "**EN-3**" is referenced from Section 3.6 characterizing the project as not a significant energy impact. However, there are only two impacts listed in Section 3.6: **EN-1** and **EN-2**. Neither impact **EN-1** or **EN-2** pertains to whether the project would result in a significant energy impact.

DATA REQUEST

50. Please include the description and discussion of impact EN-3 in Section 3.6.2 as referenced in Section 3.19.2.1 of the SPPE application.