

DOCKETED

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September 25, 2026

R&L Capital Inc. LLC
C/O Kyle Mohr
P.O. Box 9071
Trona, California 93592

Data Requests Set 2 for RB Inyokern Data Center (26-SPPE-01)

Dear Mr. Mohr:

Pursuant to California Code of Regulations, Title 14, §15084(b) and Title 20, §1941, the California Energy Commission (CEC) staff is requesting the information specified in the enclosed Data Requests Set 1, which is necessary for the staff analysis of the RB Inyokern Data Center (RBIDC or project) (26-SPPE-01). The proposed RBIDC project, located in the city of Inyokern, Kern County, includes forty (40) diesel-fired generator sets that would be used exclusively to provide up to 99 megawatts (MW) of backup emergency electric generation during utility outages to support the on-site data center operations. The RBIDC emergency backup electric generating facility would not be interconnected to the transmission or distribution grid, nor would the facility participate in demand response, peak shaving, or any grid-support operations.

This Data Requests Set 2 seeks further information in the areas of Air Quality, Cultural and Tribal Cultural Resources, Efficiency and Energy Resources, Greenhouse Gases, Land Use, Population and Housing, and Public Services based on the contents of the application submitted thus far. CEC 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 proposed project.

To assist CEC staff in completing its environmental review timely and meeting the requirements of the California Environmental Quality Act (CEQA) per California Code of Regulations, Title 14, §§ 15108, 15109, CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please send written notice to me within 10 days of receipt of this letter.

If you have any questions, please email me at Elizabeth.Huber@energy.ca.gov.

Elizabeth Huber
Project Manager

Enclosure: Data Requests Set 2

RB INYOKERN DATA CENTER DATA REQUESTS SET 2

AIR QUALITY AND PUBLIC HEALTH

Authors: Brewster Birdsall, Rachael Dal Porto

BACKGROUND: Transmittal of Electronic Modeling Files

In response to CEC staff's Data Requests Set 1, the applicant provided the revised Air Quality Impact and GHG Analysis (AQIA) as SPPE application Appendix F Supplement — Section F.1 (TN 271094, 6/29/2026) along with a collection of over 600 megabytes (600 MB) of electronic modeling files. The collection of AQIA dispersion modeling and health risk assessment (HRA) files did not contain an index or 'readme' to aid navigation. Staff needs to be able to trace the AQIA results from the modeling work.

Staff conducted a preliminary review of the updated electronic dispersion modeling files and found the provided files do not clearly support the data tabulated in the AQIA (TN 271094, 6/29/2026) or some of the statements in the Responses to DR Set 1 (TN 271129, 7/1/2026). At this time, staff remains unable to identify the specific dispersion modeling output files that correlate with each of the air pollutant dispersion modeling results tabulated in the AQIA.

DATA REQUESTS

DR AQ-18. Please provide an index of dispersion modeling and HRA modeling file folder names with a brief description of the contents.

DR AQ-19. Please identify the filenames of the specific dispersion modeling output that are the source of each of the dispersion modeling results tabulated for the Project impacts (predicted concentrations) in AQIA Tables 4-8, 4-9, 4-10, 4-11, 4-12 and 4-13 (TN 271094).

DR AQ-20. Please tabulate the names of the modeled source(s) that cause the Project impacts (predicted concentrations) for each pollutant and averaging time of the "refined" results in AQIA Table 4-10 (TN 271094).

DR AQ-21. Please name the dispersion modeling file(s) that use the applicant's "three-tier grid" for receptor spacing and a total "of 2,259 discrete off-site receptors" as described in AQIA pg. 4-16 and SPPE Application p. 212 (TN 269893). If AQIA results were drawn from modeling with narrower or smaller grids, please explain why the "three-tier grid" for receptor spacing and 2,259 discrete off-site receptors was not used.

DR AQ-22. Please name the dispersion modeling and post-processing file(s) that arrive at the health risk results for cancer risk during alternative loads and show that: "Cancer risk decreases consistently from 4.89E-06 at 100% load to 1.83E-06 at 10% load" as described in Response to DR AQ-12.

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BACKGROUND: Follow-up to Construction-Phase Emissions Revisions

In Response to DR AQ-6 through DR AQ-8, and in AQIA Table 4-3 (TN 271094), the applicant provided a revised construction emissions analysis showing construction-phase PM₁₀ and PM_{2.5} emissions would be greater than originally filed with the SPPE Application. With construction emissions updated recently, staff expects the ambient air quality impact analysis and construction-phase dispersion modeling to also be updated, yet these results in AQIA Tables 4-12 and 4-13 do not appear to be updated.

DATA REQUEST

DR AQ-23. Please identify the specific dispersion modeling output files that reflect the construction emissions analysis and emissions rates shown in AQIA Table 4-3 (TN 271094), which were revised by Response to DR AQ-6 through DR AQ-8. Please also update AQIA Tables 4-12 and 4-13 accordingly.

BACKGROUND: Modeling Nitrogen Dioxide (NO₂) 1-Hour Impacts

The applicant's modeling files (NO2ARMALT.ADO) indicate that the evaluation of the project's 1-hour NO₂ impact uses a default special processing procedure applicable to the 1-hour NO₂ NAAQS, and this is automatically enabled in AERMOD through the setting "POLLUTID NO2." In contrast with NO₂ NAAQS, the 1-hour NO₂ California Ambient Air Quality Standard (CAAQS) requires evaluation of maximum 1-hour concentrations, without special processing that applies to the NAAQS. The CAAQS values for NO₂ are not to be exceeded. Using the federal NO₂ processing procedure in AERMOD would underestimate the highest 1-hour NO₂ concentrations that must be considered in the evaluation of exceedances against the 1-hour NO₂ CAAQS.

DATA REQUEST

DR AQ-24. Please confirm that the applicant's refined analysis for the 1-hour NO₂ CAAQS provides a conservative result that matches or exceeds the result that would otherwise be obtained from AERMOD with the setting "POLLUTID NO2 H1H." If not, please reevaluate 1-hour NO₂ ambient air quality impacts using "POLLUTID NO2 H1H."

BACKGROUND: Follow-up to Screening for Low-Load Conditions

For criteria pollutant impacts at various loads, responses to DR AQ-13 and AQ-14 indicate that a screening review of "varying loads and warm-up conditions were also considered in the ambient air quality and health risk analyses" including dispersion modeling for short-term (1-hour) NO₂ ground level concentrations and health risks. However, staff has not located any summary of the resulting NO₂ concentrations or health risks during the different loads.

DATA REQUEST

DR AQ-25. Please provide a spreadsheet or summary table of the NO₂ 1-hour ground level concentrations and of health risks from diesel particulate matter (DPM) modeled

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under the alternative load scenarios to confirm the use of 100% load as a conservative assumption. This response should also provide a direct reference to the modeling files where these concentrations and health risk results may be found.

BACKGROUND: Emissions Control Device - Warm Up Duration

Vendor documentation of SCR warm-up periods appears to be missing. Applicant's Response to DR AQ-17 restates the "engine outlet temperatures" and the assumptions of "warm-up periods ranging from 7 minutes to 21 minutes depending on load point". The Response to DR AQ-17 also refers to Johnson Matthey drawings (i.e., Drawing No. 202-C0039989 Revision B), which show the general arrangement of the SCR components. The Johnson Matthey drawings do not appear to present any documentation on the duration of time needed for the SCR to achieve operable system temperatures. Without project-specific confirmation of the warm-up durations from the SCR vendor, staff would assume the SCR device takes about 15 minutes to warm up.

DATA REQUEST

DR AQ-26. Please provide vendor documentation to verify the duration (in minutes) for the warm-up period that allows the SCR to reach Tier 4 emission rates for all full-load and low-load cases.

BACKGROUND: SCR Design and Outlet Diameter

Modeled stack exit velocities appear to be excessively high, and the velocity parameter triggers multiple warning messages shown in the AERMOD modeling files output reports. Staff is concerned that the applicant overestimated the stack exit velocities by assuming that each engine exhaust stack is 12-inches in diameter. Responses to DR Set 1 refer to Johnson Matthey drawings (i.e., Drawing No. 202-C0039989 Revision B) that show general arrangement of the SCR components. The Johnson Matthey drawings show the SCR inlet and outlet would use a gasket kit of 30-inches in diameter, and this implies that the SCR outlet diameter would also be roughly 30-inches. Staff needs confirmation that the stack diameters and velocities in the AQIA were accurately representative of the proposed SCR design.

DATA REQUEST

DR AQ-27. Please provide vendor drawings or documentation confirming the general arrangement of the SCR including the SCR outlet diameter and the air pollutant release velocities for each of the engines. If the SCR outlet diameter and air pollutant release velocities confirmed via vendor drawings differ from that used in the AERMOD modeling files, please provide updated modeling outputs with the correct diameters and release velocities.

CULTURAL AND TRIBAL CULTURAL RESOURCES

Authors: Lauren DeOliveira and Michael Hoke

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BACKGROUND: Records Search Results

CEC staff has reviewed the docketed information for this project (RLC 2026b; 2026c, 2026d, 2026e, 2026s, 2026t) and has found Confidential Appendix M does not include the full records search results as required by Appendix B (g) (2) (B). Neither Department of Parks and Recreation 523 (DPR 523) forms of previously identified cultural resources nor copy of previously conducted technical studies covering the project area or buffer are included.

DATA REQUESTS

DR CUL-8. Please provide copies of all DPR 523 forms for cultural resources (ethnographic, architectural, historical, and archaeological) identified in the 1-mile literature search.

DR CUL-9. Please provide copies of all technical reports whose survey coverage is wholly or partly within 0.25 miles of the area surveyed for the project or which report on any archaeological excavations or architectural surveys within the literature search area.

BACKGROUND: Archaeological Technical Study

CEC Staff have reviewed the application and docketed technical studies for this project (RLC 2026b; 2026c, 2026d, 2026e, 2026s, 2026t) and has found that the archaeological technical study is missing a survey coverage map Please provide the following in accordance with CEQA Appendix B (g)(2)(C):

DATA REQUESTS

DR CUL-10. Please provide a survey coverage map depicting all areas surveyed including the project site, project linear facility routes, and all buffers.

EFFICIENCY AND ENERGY RESOURCES

Author: Ardalan Sofi, Ph.D., P.E.

BACKGROUND: Electrical One-Line Diagram to Verify Generating Capacity

The applicant provided the "Technical Description, Emergency Generating System – Aggregate Power Limiting" letter dated September 9, 2026. In the letter, the applicant describes the generator configuration as consisting of 38 primary generators and 2 redundant generators. In addition, the applicant proposes a power-limiting system to physically limit the aggregate real power output of the emergency generating system to below 100 megawatts (MW), specifically to 99 MW. The proposed limiting system includes hardwired protective relays and control elements associated with the generator yards and medium-voltage switchgear that are intended to prevent the generating system from exceeding the 99 MW limit. The letter states the following deliverables

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would be provided: generator control and power limiting functional description, facility electrical load summary, and commissioning and functional test protocol.

Staff requires the electrical one-line diagram to verify how the proposed power-limiting system is incorporated into the overall electrical configuration, including its interface with the generators and switchgear. This information is necessary for staff to verify the proposed physical limitation on generating capacity and complete its assessment.

DATA REQUEST

DR EFF-4. Please provide the electrical one-line diagram as soon as it becomes available. The one-line diagram should illustrate the proposed power-limiting system, including applicable power measurement points, protective relays, breaker trip/interlock or block-close functions, and connections between the generator yards and medium-voltage switchgear.

GREENHOUSE GAS EMISSIONS

Authors: Brewster Birdsall, Rachael Dal Porto

BACKGROUND: Carbon Dioxide (CO₂) Emissions from Generators

The SPPE application AQIA, revised June 2026, (TN 271094) includes the applicant's CO₂ emission calculations (AQIA Appendix A) that appear to be underestimated. Engine manufacturer specifications (in AQIA Appendix D) and similar projects using these types of engines indicate that full load CO₂ emissions would normally be over 2,000 kg/hr (or 4,400 lb/hr), which is about 3 times greater than the rate (1,451 lb/hr) shown in the applicant's emission calculations (TN 271094; PDF pp. 153-154).

DATA REQUEST

DR GHG-4. Please provide additional documentation to support the calculation of project CO₂ and other greenhouse gas emissions, such as N₂O and CH₄, for deriving CO₂-equivalent (CO₂e) emissions caused by operation of the engine-generators, and if necessary, update the GHG emissions summaries.

LAND USE

Authors: Negar Vahidi and Tatiana Inouye

BACKGROUND: Project Data and Maps

Per CEQA Guidelines Section 15378(a), a "project" evaluated under CEQA is defined as "...[t]he whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect foreseeable change in the environment."

RB INYOKERN DATA CENTER DATA REQUESTS SET 2

To evaluate the whole of the action for the proposed RB Inyokern Data Center Project, CEC staff submitted Data Requests DR LAND-1 and DR LAND-2 (TN 270553). DR LAND-1 requests information on the length of the 34.5 kV gen-tie and the number and types of structures required for the development of the gen-tie. DR LAND-2 requests shapefiles of all proposed project components, including project components that would be constructed by SCE (i.e., subtransmission lines and Inyokern Substation expansion), since the subtransmission lines and substation expansion would not be needed were it not for the development of the proposed project.

In response to DR LAND-1, the applicant states that the proposed 34.5 kV distribution system "...is underground, no overhead poles, towers, or above-grade structures are required...[and the] total conduit run length for the underground medium-voltage distribution system will be confirmed during final electrical engineering" (TN 269593, page 59). The applicant's response does not provide an estimate of the gen-tie length, nor does the applicant provide a description of the underground components that would be constructed for an underground gen-tie. If the applicant cannot provide estimates of the gen-tie length or a description of the underground construction components, CEC staff will need to make conservative assumptions for these components to support staff's CEQA analysis.

In response to DR LAND-2, the applicant provided preliminary GIS shapefiles to staff, but this geospatial data did not include the following project components: project site boundary, SCE subtransmission line route alignments, Inyokern Substation expansion area, and construction staging and laydown areas. The applicant states that "[t]he precise boundaries and alignments of certain project components – including the SCE-owned subtransmission line final route alignments, Inyokern Substation expansion area, construction staging and laydown areas, and underground medium-voltage distribution conduit routing — have not yet been finalized and will be confirmed during final engineering" (TN 269593, page 59). If finalized information about these project components is currently not available, the applicant should make conservative assumptions about each of those components and provide those assumptions to staff for the CEQA analysis.

For purposes of CEQA, the project evaluated by CEC must include the whole of the action. This includes project components that have not completed final engineering and project components that would be constructed by SCE. To support the land use and planning analysis under CEQA, CEC staff requests the information identified in the data requests below.

DATA REQUESTS

DR LAND-6. Please provide the following details regarding construction of the underground gen-tie:

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1. Describe how the underground gen-tie would be constructed. Would it be installed in an underground conduit or duct bank? What construction techniques would be used (i.e., trenching, tunneling) and what equipment would be required for construction?
2. Provide estimates of the length of the gen-tie line, and the width and depth of the underground duct bank or underground conduit.
3. Provide an estimate of the width of the temporary disturbance areas and the permanent disturbance areas along the gen-tie.

DR LAND-7. Please provide geospatial data of the following project components:

1. The project site boundary. Please note that the project site boundary must encompass all disturbance areas, access roads, walls and fencing, etc. that are components of project construction and operation.
2. Linear facilities, including the 115-kV subtransmission line routes and the utility fiber optic routes.
3. Inyokern Substation expansion area.
4. Location of construction staging and laydown areas.

BACKGROUND: Specific Plan Amendment and Conditional Use Permit Application

To support staff's evaluation of project consistency with land use plans, policies, or regulations per CEQA Guidelines Appendix G, CEC staff submitted Data Request DR LAND-5 to request further information on the location of the secondary collector to be eliminated by the proposed Inyokern Specific Plan Amendment, and to request an evaluation of the project's compliance with each of the development standards for a Medium Industrial (M-2) zoning district (TN 270553).

In response to DR LAND-5, the applicant docketed Appendix N Supplement - Section N.4 (TN 271099) that includes the project-specific applications for an Inyokern Specific Plan Amendment and a Conditional Use Permit. Staff reviewed the project site maps provided in Appendix N.4 (SP-1.1 Site Map Overview, Sheet 2 of 2) and observed that the project site perimeter overlaps with two Kern County road easements, listed as Easement No. 1 and Easement No. 2 on Figure SP-1.1 Site Map Overview. Figure SP-1.1 describes Easement No. 1 as an "easement for public highway purposes, County Road No. 440, also known as Inyokern Road." Figure SP-1.1 describes Easement No. 2. as an "easement for public highway purposes, County Road No. 697, also known as State Highway Route 178." Staff notes that Easement No. 2 is a separate easement from State Route 178 and is located approximately 50 feet north of State Route 178. The proposed project application does not discuss the proposed project's overlap with either of these existing County easements, nor does the application discuss whether an encroachment permit would be required for project construction within each easement.

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DATA REQUEST

DR LAND-8. Please provide the following:

1. Describe in detail the project activities proposed within Easement No. 1 and Easement No. 2, as identified in Figure SP-1.1 from Appendix N Supplement - Section N.4 (TN 271099).
2. Explain the type(s) of permit(s) required for these project activities and the agencies that typically have jurisdiction to issue each permit.

POPULATION AND HOUSING

Authors: Negar Vahidi and Irene Kaufman

BACKGROUND: Project Construction and Operation Workforce

Per CEQA Guidelines Section 15378(a), a “project” evaluated under CEQA is defined as “[t]he whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect foreseeable change in the environment.”

To evaluate the whole of the action for the proposed RB Inyokern Data Center Project, which includes the SCE 115 kV subtransmission facilities, fiber optic routes, and substation expansion, CEC staff submitted Data Request DR POP-1. In the applicant’s response to DR POP-1, the applicant confirmed that the estimated peak construction workforce of approximately 600 workers does not include the SCE construction workforce. The applicant confirmed they will provide SCE construction workforce information once that information becomes available through the MOS174 construction coordination process, prior to the commencement of SCE construction activities. To analyze the whole action during the environmental review process, if the total workforce numbers are currently not available, the applicant can make assumptions for the projected total workforce involved to complete these project components to facilitate staff’s CEQA analysis.

DATA REQUESTS

REV 1 DR POP-1. Please provide assumptions for the construction workforce (i.e., maximum project construction workforce) required to complete the construction activities described in Section 2.5 of the application (i.e., constructing the SCE 115 kV subtransmission facilities, fiber optic routes, and substation expansion).

REV 1 DR POP-2. Please provide the MOS174 study for CEC staff to review.

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PUBLIC SERVICES

Authors: Negar Vahidi and Irene Kaufman

BACKGROUND: Capacities, Service Standards, and Response Times

California Code of Regulations, title 20, Appendix B (g)(7)(A)(vi) requires the application include the capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities. California Code of Regulations, title 20, Appendix B (g)(7)(B)(i) specifically asks for response times to hospitals and for police protection, fire protection, emergency services, parks and recreation facilities, libraries, and other public facilities.

In response to DR PS-1, the applicant docketed copies of emails reaching out to fire protection, law enforcement, and emergency response agencies to request information regarding current service standards and response times. However, their responses to the information requested have not been received.

DATA REQUEST

REV 1 DR PS-1. Please provide the agencies' responses to current service standards and response times of the affected fire protection services, law enforcement, and emergency response agencies.