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<b>Document Title:</b>	CALIFORNIA UNIONS FOR RELIABLE ENERGY MOTION TO LEAVE TO FILE DATA REQUESTS
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<b>Submitter Role:</b>	Intervenor Representative
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**STATE OF CALIFORNIA**

**Energy Resources Conservation  
and Development Commission**

In the Matter of:

SAN JOSE CITY DATA CENTER

Docket No. 19-SPPE-04

**CALIFORNIA UNIONS FOR RELIABLE ENERGY  
MOTION TO LEAVE TO FILE DATA REQUESTS**

May 28, 2020

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**MOTION OF CALIFORNIA UNIONS FOR RELIABLE ENERGY FOR  
LEAVE TO FILE DATA REQUESTS**

Pursuant to sections 1716 and 1941 of Title 20 of the California Code of Regulations, California Unions for Reliable Energy (“CURE”) files this Motion for Leave to File Data Requests (“Motion”) for the San Jose City Data Center, Docket No. 19-SPPE-04 (“Project”).

Section 1716 (b) grants “any party” the right to request from the applicant any information which is reasonably available to the applicant and relevant to the application proceedings or reasonably necessary to make any decision on the application. Pursuant to section 1941, the presiding member may allow data requests to be filed more than sixty days after a small power plant exemption (“SPPE”) application is filed. The Project SPPE was filed on November 15, 2019. CURE seeks leave from the presiding member to file the data requests attached as Appendix A to this motion.

Commission Staff filed five sets of data requests between December 19, 2019 and May 6, 2020. On May 26, 2020 the Project Applicant requested additional time, until July 7, 2020, to respond to data requests because of delays in gathering information due to the COVID-19 pandemic. Therefore, CURE’s data requests will not delay this proceeding.

Further, CURE attempted to obtain information related to the Project by filing a request pursuant to the Public Records Act on May 4, 2020. However, after reviewing the responsive documents, we have determined that additional information is necessary to fully assess the Project's potential to cause substantial adverse impacts on the environment and energy resources.

CURE's data requests seek Project details that were omitted from the Project's SPPE Application, including information related to the Project's electricity demand, public health impacts, air quality impacts, and water supply impacts. CURE has determined that this information is necessary to accurately and completely describe the Project, and to fully assess the Project's impacts.

For these reasons, CURE has good cause to submit these data requests after 60 days from the Application filing date. CURE respectfully seeks leave to file Data Request Set Number One, attached to this motion as Appendix A.

Dated: May 28, 2020

Respectfully submitted,



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# APPENDIX A

**CALIFORNIA UNIONS FOR RELIABLE ENERGY – DATA REQUEST SET**  
**NUMBER ONE**

**ELECTRICITY DEMAND**

The SPPE Application fails to describe all sources of electricity uses for the Project.

1. Please provide the vendor specifications for all of the electrical equipment that would support the project, e.g., IT equipment, ancillary electrical/telecommunication equipment, electrical switchgear, lights, heating etc.
2. Please provide calculations that support the estimated electricity usage of 803,730 MWh/yr.

**WATER USE**

The SPPE Application states that water supply for the Project will be from the San José Municipal Water System and include reclaimed water, groundwater, and water purchased from the San Francisco Public Utilities Commission. Please provide the following information needed to understand the impacts of water supply for the Project:

3. Will serve letter from water purveyor,
4. Water quality data for the reclaimed and potable supplies that will be used by the Project,
5. Sources of potable water, including imported surface water and groundwater well locations,
6. Vendor specifications for the adiabatic cooling system,
7. Calculations that support the estimated water consumption of 29.1 AF/yr of which 9 AF/yr is potable,
8. Chemical composition of recycled water used in the adiabatic cooling system, including HAPs, and
9. An estimate of electricity to convey and treat the Project's water demand.

## **DIESEL GENERATOR POLLUTION CONTROLS**

The SPPE Application fails to fully describe the pollution control measures proposed for the Project. Please provide the following information so the public can fully assess the impacts of the Project:

10. Documents cited in response to DR-40, which references “engine manufacturer information on SCR,”
11. Vendor specification sheets for the backup diesel generators,
12. All vendor correspondence on SCR and diesel particulate traps for the diesel generators, including specifically vendor support for the NO<sub>2</sub>/NO<sub>x</sub> ratio as a function of engine load and the citation to "engine manufacturer information on SCR" cited in response to Staff DR-40,
13. Vendor specifications for SCR including type of catalyst, catalyst changeout frequency, catalyst disposal or recycle, ammonia slip limit, and form of ammonia (anhydrous or aqueous),
14. Assumptions about transformation of ammonia slip in the atmosphere used in air quality modeling,
15. Ammonia supply route(s) for delivery to site,
16. Vendor guarantees for PM<sub>2.5</sub> and PM<sub>10</sub> for the diesel particulate traps,
17. Vendor guarantees, including for all pollutants, as a function of load, for the diesel generators. If no guarantees are currently available, all correspondence relating to performance of the SCRs and diesel particulate traps,
18. Vendor guarantees for compiled NO<sub>x</sub> emissions in Table DR43-1, and
19. All correspondence between diesel generator vendor and applicant regarding emissions of any pollutant.

## **HEALTH RISK ASSESSMENT**

The SPPE Application lacks native electronic files needed to assess its accuracy.

20. Please provide all HARP2 and any other risk assessment modeling files in native electronic format.



## **AIR QUALITY**

The SPPE Application does not contain all supporting information necessary to evaluate the accuracy of the air quality impacts and modeling. Please provide the following information:

21. All BAAQMD correspondence and other files per Staff DR 32,
22. Unlocked Excel spreadsheets supporting all emission calculations,
23. Unlocked CalEEMod files, showing all inputs and outputs,
24. All estimates of emissions associated with electricity consumption,
25. Vendor support for diesel generator source parameters used in modelling including stack height and diameter, exhaust temperature, and exit velocity, and
26. Air quality modeling files including all AERMOD input and output files in native electronic format, including supporting pre-processing (BPIP-PRIME, AERMAP) files; all met files in native electronic format, and all plot files in native electronic format.