

## **Letter of Justification**

### **Vantage Data Centers Use Permit Application**

#### **PLN23-00308**

Vantage Data Centers (VDC) is requesting a use permit for the installation of four additional emergency generators at Bldg CA23 on its existing site located at 737 Mathew Street (Project). These additional generators are required to meet the power back-up and redundancy requirements of VDC's current customer.

The Project will include four additional 2.75MW generators, with the same amount of testing hours associated with the site's original approvals. Included with our application materials is a study from Ramboll, which demonstrates that the addition of the four generators do not cause any additional air quality impacts. The Addendum prepared by ICF reinforces this conclusion.

The Project does not require additional electrical demand from the Parker substation because the total electrical demand will not exceed the 100-megawatt California Energy Commission (CEC) threshold. Accordingly, the CEC has confirmed that this modification does not require additional CEC approval. VDC will limit the non-emergency runtime hours for the entire facility to 1,998 hours per year, which is below the total allowable operating hours contemplated in the CEC's Small Power Plant Exemption (SPPE) and permitted by the City.

Since the original project's approval, the Bay Area Air Quality Management District (BAAQMD) redefined what constituted Best Available Control Technology (BACT) for large emergency standby engines; therefore, all 21 generators at the CA23 building are required to be Tier 4 and will be installed with Diesel Particulate Filter (DPF) and Selective Catalytic Reduction (SCR) abatement devices. This installation is included as part of this use permit request.

As shown in the Ramboll report and the Addendum, the addition of four new generators does not result in any significant environmental impact. In fact, there is an overall decrease in emissions as a result of the implementation of Tier 4 controls on the CA23 generators. Additionally, there is also a net reduction in GHG emissions.