

requirements, and New Source Performance Standards (NSPS) for Stationary Combustion Turbines (40 CFR Part 60, Subpart KKKK)

- Facility: Thunderhead San Antonio Data Center Power Project utilizing Solar Turbines (Caterpillar) Titan-130 industrial gas turbines with EnergyLink SCR technology (Best Available Control Technology, “BACT”) for emissions reduction
- Duration: Two-year exemption to allow expedited construction and operation
- Justification: Current permitting timelines create critical delays and/or outright roadblocks for essential digital infrastructure. Despite employing advanced emissions control technology, the standard permitting process would prevent timely deployment of urgently needed computing capacity and ultimately limit the operable electric generation capacity via NOx, CO, VOC, particulate matter, sulfuric acid, and sulfur dioxide emissions limitations. There is no commercial technology to completely eliminate NOx, CO, VOC, particulate matter, sulfuric acid, or sulfur dioxide emissions from gas-fired EGUs.
- National security relevance: The facility will support enterprise cloud and AI computing infrastructure essential to U.S. national security interests, including classified government workloads and critical AI development. Current grid constraints in Bexar County, TX prevent timely utility-scale power deployment, while our behind-the-meter natural gas solution can deliver 500MW in 18-24 months, significantly accelerating national security-related computing capacity.

This bridge natural gas solution represents the only viable path to rapidly deploy the power capacity required for next-generation computing infrastructure critical to maintaining U.S. technological leadership. We respectfully request this time-limited exemption to expedite deployment while maintaining substantial emissions controls through our SCR implementation.

Sincerely,

Brennan Zaunbrecher
Founder
Thunderhead Energy Solutions LLC