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December 4, 2025

Senator Stephen Padilla
California Senate Office
1021 O. Street, Suite 7630, Sacramento, CA 95814

Re: Response to Letter to Imperial County Regarding 330 MW Data Center Campus

Dear Senator Padilla,

As the developer of the 330 MW Data Center Project, we appreciate the legitimate concerns raised regarding water use and power reliability. We share the community's interest in protecting local resources and ensuring responsible growth in the Valley. This project has been designed to meet high environmental standards while delivering meaningful local economic benefits. We are committed to ongoing dialogue with community stakeholders.

From the outset, the campus has been designed around clear, enforceable operational commitments intended to protect the Imperial Valley's water and electric systems:

- 100% renewable power
- 100% reclaimed water (no potable water demand)
- Zero cost to IID or water ratepayers
- Peak-shaving to eliminate grid stress
- Industrial-zoned location chosen for compatibility
- Noise and emissions minimized through modern design

These commitments reflect a practical approach: the project must function reliably without shifting costs or resource burdens onto existing residents, farmers, or ratepayers.

1. PROJECT OVERVIEW AND ENVIRONMENTAL COMMITMENTS

1.1 Land Use Compatibility and Permitting Basis

The data center campus is located in an industrial-zoned area selected specifically to align with existing land-use policy. We have included documentation from Imperial County confirming that a data center use is permitted "as of right" under current industrial zoning.

We are also providing materials addressing the project's permitting pathway, including documentation regarding CEQA applicability. As shown in the attached materials:

- The project's relevant approvals consist of ministerial permits (e.g., grading, site plan, building permits, lot merger), which are exempt from CEQA.
- The record includes a Notice of Exemption and supporting reports addressing why data centers on industrial-zoned land are exempt from CEQA review.

1.2 Infrastructure Serviceability (Water, Sewer, Gas, Electricity)

We are also providing site plans, grading plans, a lot merger package, and survey information demonstrating that the project site can be serviced with: Sewer, Water, Gas and Electricity. The project has been planned specifically to utilize existing or planned utility corridors and service capabilities consistent with an industrial use in this location.

1.3 Power Supply, Grid Impacts, and Reliability Commitments

We recognize that "renewable power" and "grid impacts" require engineering support and a realistic operational plan. We are providing IID and third-party studies that address feasibility and system impacts, including IID Feasibility Study; IID System Impact Study (250 MW on S-line); and IID System Impact Study (80 MW on R-line).

We are also providing correspondence regarding wholesale power procurement, supporting the strategy to secure renewable energy in a way that reduces peak stress. A core operational objective is peak-shaving / load-shaping so the campus minimizes grid stress during peak hours thereby protecting system reliability for existing customers.

1.4 Water Supply: Reclaimed Water Only

We understand the Valley's sensitivity to water availability and will use 100% reclaimed water, avoiding demand on potable supplies. We are providing reclaimed-water reports from City of El Centro and the City of Imperial. These materials document reclaimed water is available and the project's will rely on reclaimed sources rather than potable water.

2. WATER USE: 100% RECLAIMED WATER; ZERO RATEPAYER IMPACT

The data center will use 100% reclaimed (tertiary-treated) water supplied by the City of El Centro from its Wastewater Treatment Plant. No potable water will be used, and no existing IID allocations will be diverted to supply the project.

2.1 Project-Funded Infrastructure (No Cost to Ratepayers)

To ensure reclaimed water availability and reliability, we funded the required engineering studies and agreed to pay for construction of the additional reclamation facilities and associated pipeline infrastructure needed to deliver reclaimed water to the site. As a result, these improvements are project-funded and do not require ratepayer subsidies.

2.2 Net-Positive Reclamation and Purchase Structure

Under the El Centro arrangement, the project will reclaim 4 million gallons per day (MGD) of treated wastewater, and purchase approximately 750,000 gallons per day of reclaimed water for facility operations. In other words, the project will reclaim five times more water than it will purchase, creating surplus reclaimed water capacity for the City.

2.3 Economic Benefit to the City

The project will pay the City for reclaimed water, producing a net-positive revenue stream for El Centro. In addition, the project's capital investment in treatment and conveyance infrastructure improves the City's long-term reclaimed-water capability without shifting costs to residents.

2.4 No Impact to Local Water Rates or Availability; Environmental Upside

Because the project uses reclaimed water and pays for all upgrades, there is no impact to local potable water supplies, no reduction in existing water availability, and no upward pressure on water rates. The surplus reclaimed water will provide additional community benefits and can be sold or made available to local agricultural users, and/or flow to the Salton Sea via the canal system providing environmental benefit.

2.5 Additional Reclaimed Water Commitment (City of Imperial)

Separately, we have negotiated to reclaim an additional 2 million gallons per day (2 MGD) from the City of Imperial. As with El Centro, we funded the study and will fund necessary upgrades to enable reclamation and delivery, ensuring no ratepayer impact. The City of El Centro reclaimed water study and the City of Imperial's study are attached.

3. IID STUDIES CONFIRMED THE FEASIBILITY OF 330 MW

Multiple engineering studies conducted with IID confirm the 330 MW request requires no IID-funded upgrades, as there were no impacts to the main power line during testing. We will fund the entire on-site substation, currently estimated to cost $80 million.

Four studies have confirmed the project's technical feasibility. IID performed three studies for delivery of 250 MW on the 230 kV S-line and 80 MW on the 92 kV R-line:

- December 4, 2024 -- Power Engineers Load Injection Study: Concluded there was 557 MW capacity available in the summer on the 230 kV S-line, and 108 MW capacity in the summer on the 92 kV R-line.

- May 22, 2025 -- IID Feasibility Study (250 MW on 230 kV S-line): Concluded: "There were no thermal violations in IID's transmission system" and the "Project did not cause any buses to experience voltage exceedances or deviation."

- July 25, 2025 -- IID System Impact Study (250 MW on 230 kV S-line): Evaluated multiple scenarios and concluded: "Results showed there were no thermal violations in IID's transmission system" and the "Project did not cause any buses to experience voltage exceedances or deviations. Results showed there were no transient stability violations in IID's transmission system under any of the simulated contingencies. Study results show that this **project can be deemed feasible**."

- September 23, 2025 -- IID System Impact Study (80 MW on 92 kV R-line): Analyzed reliability impacts and concluded the "**Project can be deemed feasible** with some transmission infrastructure upgrades." The required upgrades (installed in the new substation) include a static var device rated 75 MVAR, configured in three switching blocks of 25 MVAR each, to provide reactive power support and voltage stability.

The final step is the Facility Study, which Power Engineers will perform under IID's technical direction. It should be complete this month. The four studies are attached.

4. POWER SUPPLY: NO COST SHIFT; GRID-PROTECTIVE OPERATIONS

The data center has agreed to accept non-firm transmission from IID. In effect, if IID experiences peak demand or system constraints, IID can curtail service to the data center. The data center would meet its load using on-site backup batteries. This eliminates risk to IID and its ratepayers. There are three viable pathways to serve the 330 MW load:

- Wholesale market supply from CAISO until long-term PPAs are secured;
- Third-party energy supply with IID providing transmission/wheeling service; or
- Direct purchase from IID at its published wholesale rates.

4.1 Wholesale Market Proposal (CAISO interim supply)

IID is scheduled to begin operating under newly executed agreements with CAISO that enable IID to purchase energy directly from the CAISO wholesale market. We submitted a proposal under which the data center would purchase energy on a short-term basis from the CAISO day-ahead market, with IID providing required scheduling and coordination services. Under this proposal, IID faces no stranded investment risk, no credit risk, and no operational burden beyond defined market participation services, and would be compensated through a cost-plus framework.

All economic and reliability risk is borne by the data center, which pays all energy, capacity, and administrative costs. To eliminate credit exposure, a dedicated account is set up accessible by IID to cover all market charges and related costs. Importantly, because IID retains responsibility for scheduling, coordination, and settlement via the established draw account for the data center, this structure poses no threat of exposing IID to direct access, which IID does not permit

The cost-plus model would compensate IID through (i) a scheduling/coordination fee, (ii) applicable transmission charges, and (iii) an administrative markup. We estimate this structure could generate approximately $25 million in positive annual revenue to IID. This approach allows the project to proceed while long-term PPAs are secured. This will likely increase demand for new renewable generation in Imperial Valley, which will stay in the Valley rather than export outside the Valley which will reduce grid stress and improve transmission balancing.

4.2 Purchase from Third Parties; pay IID to transmit the load

Imperial County generates approximately 3,090 MW of power, of which roughly 2,000 MW are exported. IID's interconnection queue reflects more than 5 GW of pending projects. However, most of this renewable energy will export out of Imperial Valley.

The data center provides a large, stable local load that enables generation to remain in Imperial Valley. Under this option, the data center would purchase power from third-party suppliers and pay IID to transmit/wheel that power to the project. This approach presents no stranded investment or commodity price risk to IID and is estimated to provide $15 million in positive annual revenue to IID through transmission-related charges and associated fees.

4.3 Purchase the load from IID at published wholesale rates

IID publishes wholesale electric service rates designed to recover all costs plus administrative components, including: General Wholesale Power Service (Schedule A-2); High Voltage Rider (Rider HV); Economic Development Rate (Schedule ED). If the data center purchases power directly from IID under these published rates, the annual cost is estimated at approximately $250 million. Because the rates are structured to ensure cost recovery (including administrative markups), purchasing under published tariffs ensures no cost-shift and no risk to IID or its ratepayers.

5. PROTECTING THE GRID: PEAK-SHAVING & 100% RENEWABLE POWER

The Battery Energy Storage Systems (BESS) provides immediate coverage (milliseconds) for critical loads. The on-site BESS provides immediate support for short-term power disruptions, and the natural gas backup generators provide power during emergency blackouts. The data center campus incorporates large-scale Tesla Megapack battery systems to reduce grid stress. These systems allow the facility to supply its own stored energy during peak hours. Long-term operations are planned to run on 100% renewable energy, including geothermal and solar power sourced from Imperial Valley. Wholesale service is used only as a temporary bridge until full renewable PPAs are in place.

5.1 Supporting Local Renewable Development

Imperial Valley's geothermal resources currently face limited local demand. The data center helps unlock additional geothermal investment by providing a stable, high-volume renewable power customer. This strategy will further support regional economic development, job creation, and the long-term Lithium Valley vision.

6. BACKUP GENERATORS: EMERGENCY USE ONLY, CLEAN, AND PERMITTED

The backup generators will be connected to dedicated natural gas pipelines and operate solely during electrical outages and routine maintenance and testing. They will not connect to the transmission grid. They will not export electricity to the grid. They are exclusively for ensuring continuous power during an emergency blackout. The onsite 862 Megawatt Hours BESS delivers power within milliseconds for short term interruptions. In an emergency scenario the data center will be powered by the emergency backup generators. Upon the resumption of normal utility power, the automatic transfer switches will intelligently route power back from the utility, without interruption.

State, Federal and County laws permit the generators to operate for a maximum of 100 hours for maintenance and testing. The Data Center agrees to restrict maintenance and testing to 36 hours annually as a permit condition. The Data Center generators will be directly connected to the SoCal Gas pipeline for continuous fuel supply. This eliminates on-site fuel storage. The Data Center will use the Caterpillar G3520 for emergency backup.

Emergency generators will run on clean natural gas, not diesel, and will operate only during limited testing windows. Air quality impacts from these generators are negligible. SoCalGas high pressure natural gas lines are located on the border of the Data Center on Aten Road. The G3520 natural gas generators are U.S. EPA Certified for Emergency applications which ensures that the G3520 meets federal emission standards for backup generators. The backup generators are presently going through APCD for permits for the generators. Attached are reports submitted to APCD for approval of the backup generators.

6.1 Noise-Mitigation

The Emergency Generator Building will include noise mitigation strategies -- sound enclosures, exhaust silencers, and acoustic barriers -- and acoustic modeling during design. The data center employs advanced noise-mitigation building materials and design practices to ensure compliance with local sound limits. The Data Center will be a state of art facility with appropriate technology to mitigate any sound impact from its operation.

7. LAND-USE COMPATIBILITY

The proposed data center is located on 75 acres already zoned Industrial. The industrial zoning has been in place for over 27 years. Some of the five parcels were zone industrial over 45 years ago. When the City of Imperial annex the land in 1994 our land was already zoned industrial. When the adjacent homes were built, the builder and homeowners were aware that industrial development, including data centers, was a lawful use of the adjacent land. The data center is located on long-established industrial land.

7.1 Zoning Compliance

The data center campus comprises four structures, the data center building, backup generators, backup batteries, and an electric substation. The 75 acres comprises five parcels. Three are zoned M-2, one is zoned M-1 and a 5 acre parcel is zoned A-2. The industrial zones comprise 70 of the 75 acres (93%).

The data center is located on the M-2, Medium Industrial Zone, where data centers are a permitted use (§ 90516.01(w)). Data centers are also a permitted use in the M-1, Light Industrial Zone. (§ 90515.01(bbb)). The electric substation is a located on the M-1 Zone, and it's a permitted use in that zone (§ 90515.01(vvvvvvv)). It is also a permitted use in the M-2 Zone. (§ 90516.01(b)).

The backup batteries and backup generators are located on land zoned M-2. The M-2 zone permits "accessory" structures necessary to the main use and "located on the same lot" as "the primary structure." (§ 90516.01(w)). The battery and backup generators are permitted accessory structures "subordinate" to the primary structure and "customarily incidental" to the main building and "located on the same lot/parcel with the main building." (§ 91404.11).

The 5 acre that is zoned A-2 is located at the southwest corner of the property. Neither that data center, substation, backup generators, nor the backup batteries are located on that parcel. The retention pond is located on the 5 acre parcel, and land which collects water with no structures is a permitted use in the A-2 zone (§ 90508.01).

8. COMPLIANCE WITH SITE DEVELOPMENT STANDARDS

The Project's site plan complies with applicable standards for industrial zoning districts, including both M-1 (Light Industrial) and M-2 (Heavy Industrial) requirements.

8.1 M-1 Zone Site Development Standards

The site plan satisfies the M-1 Zone requirements:

- Minimum Lot Size (§ 90515.04)
- Yards and Setbacks (§ 90515.06)
- Height Limit (§ 90515.07)
- Minimum Distance Between Structures (§ 90515.08)
- Parking (§ 90515.09)
- Landscaping (§ 90515.11)

8.2 M-2 Zone Site Development Standards

The site plan is satisfies the M-2 Zone requirements:

- Minimum Lot Size (§ 90516.04)
- Yards and Setbacks (§ 90516.06)
- Height Limit (§ 90516.07)
- Minimum Distance Between Structures (§ 90516.08)
- Parking (§ 90516.09)
- Landscaping (§ 90516.11)

8.3 Compliance with Industrial Development Standards

The site plan complies with the County's Standards for Industrial Zones. (§ 90301.02.) Those standards specifically address buffering where industrial uses abut residentially-zoned property, providing that when industrial zoning is adjacent to property zoned for single-family residential use, a six-foot-high masonry wall must be constructed between the proposed development and the adjacent property. (§ 90301.02, subd. J.)

The Project's site plan incorporates this required separation/buffering measure where applicable and, overall, meets the industrial-zone standards--including minimum lot size, setbacks, height, parking, and landscaping--applicable to development in the M-1 and M-2 districts. (§§ 90301.02, subd. J; § 90515.04, § 90515.06--.09, § 90515.11; § 90516.04, § 90516.06--.09, § 90516.11.)

9. Compliance with Grading Permit Standards

Imperial County regulates grading, excavation, and earthwork through its adoption of the California Building Code provisions governing grading (including Appendix J) and through its local Grading Regulations. (§ 91011.00 *et seq*.) Together, these requirements establish the administrative process, submittal requirements, technical standards, and inspection controls applicable to grading.

9.1 Permit Submittal Requirements

Under the County's grading ordinance, a grading permit application must include detailed plans identifying existing and proposed site conditions and improvements, including: existing and proposed elevations and structures; property lines; irrigation and drainage systems; and protective devices (including fences and barricades) used in connection with the proposed work. (§ 91011.01.) The County often requires supporting technical studies, including an engineer's geological report and a soil engineering report. (§ 91011.01.) For a building pad, this is commonly addressed through a geotechnical report confirming suitable subgrade conditions and specifying compaction and testing requirements to ensure the pad is appropriately prepared for the intended structural load.

9.2 Technical Standards (Cut/Fill Slopes)

Imperial County's grading regulations also impose objective design standards for earthwork geometry. In particular, cut and fill slopes are limited to a maximum steepness of 1.5 horizontal to 1 vertical. (§ 91011.02(A)(4).) The grading design will therefore be prepared to comply with these slope limitations (or incorporate engineered alternatives if allowed by the County based on site-specific geotechnical recommendations), and will be reflected in the stamped grading plans submitted for County review.

9.3 Implementation and Compliance

The grading plans for the data center campus comply with these requirements by: (1) submitting engineer-stamped grading plans depicting existing/proposed grades, drainage and irrigation features, site protective measures, and relevant structural pads and improvements; (2) providing geotechnical/soils documentation to support pad preparation and compaction specifications for structural support; and (3) designing all cuts and fills to satisfy the County's maximum slope standard of 1.5:1 (H:V). (§§ 91011.01, 91011.02(A)(4).)

10. COMPLIANCE WITH LOT MERGER STANDARDS

A voluntary, owner-initiated lot merger must be processed by the County within the statewide lot merger framework. (Gov. Code, § 66451.10 et seq.) Imperial County's implementing procedure -- "Lot Merger Initiated by Property Owner" (Imperial County Zoning Ordinance, § 90808.00 et seq.) -- requires a public hearing at which the County determines whether the "application is categorically exempt under CEQA" and whether the merger satisfies the substantive criteria in § 90808.03.

Under § 90808.03, the County must find, among other things, that: (a) the lots are contiguous; (b) the merger conforms to State and County law; (c) the merged lots were legally created; (d) the merger does not affect any right-of-way; (e) the merger will not impact access; (f) the merger will not restrict access to adjoining lots; (g) the merged lot will not conflict with existing structures; and (h) no new lot is created by the merger.

Here, the merger of five contiguous lots into one lot readily satisfies each of these requirements. The lots are contiguous; the merger conforms to applicable State and County law; the lots were legally created; there is no disqualifying effect on any right-of-way; the merger will not impair access to the merged lot or restrict access to adjoining lots; it creates no conflict with existing structures; and it does not create any new lots. (§ 90808.03.)

10.1 Single Base Zoning Rule

Imperial County's split-zoning rule provides "Every lot . . . within the unincorporated areas of the County of Imperial shall be classified in only one of the base zoning areas. . . Where a zoning map shows two zones on the same parcel the parcel shall have the larger of the two zones applicable to the entire parcel regardless of the map depiction." (§ 90501.01).

The subject property totals approximately 75 acres, consisting of approximately 45 acres zoned M-1, 25 acres zoned M-2, and 5 acres zoned A-2. Because M-1 is the largest base zoning designation by area, application of the County's single base zoning rule means that, upon merger, the consolidated 75-acre parcel would be classified M-1. (§ 90501.01.)

In any event, even assuming arguendo that the pre-merger zoning designations were to remain unchanged post-merger, the industrial zoning designations (M-1 and M-2) allow the Project as of right, independent of the lot merger outcome.

11. MINISTERIAL VS. DISCRETIONARY PROJECTS

California law draws a sharp distinction between ministerial and discretionary approvals. CEQA is only triggered by discretionary approvals. Ministerial approvals involve applying fixed, objective standards. They do not allow subjective judgment to deny or condition the project. **In Imperial County, data centers are a permitted use ("by right") in an industrial zone**, meaning a compliant project only needs building permits or, at most, staff-level design review for grading, site plan, and lot merger. Because the data center approval is ministerial there is no subjective judgment to deny it.

Ministerial decisions require only a determination of conformity with fixed standards. Imperial County correctly concluded that the grading, site plan, and lot merger, complied with all of its regulations. The County has also correctly concluded that the **grading plan is exempt under CEQA's ministerial exemption**. "If the lead agency concludes a project is exempt from review, it must issue a notice of exemption citing the evidence on which it relied in reaching that conclusion. The **agency may thereafter proceed without further consideration of CEQA**." *Union of Med. Marij. Patients, Inc. v. City of San Diego* (2019), 7 Cal. 5th 1171, 1186. Imperial County has correctly followed state law by filing a Notice of Exemption and proceeded without CEQA review.

The project opponents overlook the following:

- The project is ministerial.
- A grading permit is ministerial.
- A lot merger is ministerial.
- A data center in an industrial zone is permitted as of right and is therefore ministerial.
- Ministerial approvals do not involve public hearings.

The project opponents seek to insert public discretion -- and thus CEQA -- where the Legislature has expressly foreclosed it. Doing so would convert straightforward ministerial approvals into an open-ended discretionary process dominated by public opinion, which CEQA forbids. "CEQA does not require an analysis of subjective psychological feelings or social impacts." (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 579.) The opponents seek a discretionary process in clear violation of CEQA.

The fact that a data center located on industrial land may be controversial, does not alter the fact that it is exempt from CEQA. "Indeed, it is entirely possible, if not **common, for a controversial or unpopular project to be exempt from CEQA**. Neighborhood sentiment is not an impact that must be directly considered in the environmental determination process." (*McCann v. City of San Diego* (2021) 70 Cal. App. 5th 51, 86.)

12. GRADING, SITE PLAN, AND LOT MERGER: MINISTERIAL AND CEQA EXEMPT

Under CEQA, the lead agency, here Imperial County, has exclusive authority to determine whether a project is exempt from CEQA. Imperial County's Zoning Ordinance defines "Ministerial decision" as a "decision requiring the application of the statutes, ordinances, or regulations to the facts as prescribed and involving little or no personal judgment by the public official or decision-making body as to the wisdom or manner of carrying out a project." (§ 91401.12). In Imperial County, a site plan, grading plan and a lot merger are considered ministerial.

Imperial County's consistent practice is to treat grading plans, site plans and lot mergers as exempt from CEQA. Title 14, § 15304, subdivision (a) exempts "grading on land with a slope of less than 10 percent" from CEQA compliance. In *Madrigal v. City of Huntington Beach* (2007) 147 Cal.App.4th 1375, 1379, 1385-1386, the court held that a grading permit for an entire parcel, including elimination of areas of flooding by scraping and filling, was exempt from CEQA review. The County has correctly concluded that:

- The lot merger is compliant with all applicable regulations.
- The site plan is compliant with all applicable regulations.
- The grading plan is compliant with all applicable grading regulations.
- The lot merger, and grading permit are ministerial and therefore exempt from CEQA.

According to the California Supreme Court, the County may therefore "proceed without further consideration of CEQA." *Union of Med. Marijuana Patients*, 7 Cal.5th at 1186. The City of Imperial has no legal authority to reopen, toll, condition, or otherwise interfere with that determination.

The project opponents seek to insert public discretion -- and thus CEQA -- where the Legislature has expressly foreclosed it. Doing so would convert straightforward ministerial approvals into an open-ended discretionary process dominated by public opinion, which CEQA forbids. Clearly, the project opponents may comment, but they seek instead to create discretion where county laws and state law mandates none.

13. DIRECT RESPONSES TO YOUR QUESTIONS

- CEQA Status: The project is exempt under CEQA due to ministerial approvals.
- Negative Declaration: Not applicable; CEQA does not apply to ministerial actions.
- Water Source: 100% reclaimed water/tertiary treated water.
- Energy Source: Short term CAISO wholesale purchase; long-term geothermal/solar.
- Generators: Emergency backup only; EPA certified natural-gas units; no grid export.
- Nearest Residence: The nearest home is located 200 feet from the data center building, it is separated by dense landscape buffer and a six-foot masonry wall.

14. SUMMARY: RESPONSIBLE, SUSTAINABLE, COMMUNITY-ALIGNED PROJECT

California property owners are entitled to rely on adopted zoning and development regulations and to seek project approvals under the objective standards in effect. Where a proposed use is permitted by right and the County's role is limited to verifying compliance with fixed, objective requirements, the approval is ministerial and is therefore not subject to CEQA review. Similarly, where State law provides applicable CEQA exemptions, applicants are entitled to rely on those exemptions as written and as implemented through the County's adopted procedures. It would be inappropriate to impose new discretionary criteria, create extra-statutory hearing requirements, or require the County to invent processes that conflict with its adopted ordinances or with State CEQA law. The County should apply the rules on the books -- no more, no less -- and avoid ad hoc procedural additions that would undermine regulatory predictability and invite inconsistent outcomes.

This project has been designed to meet high standards of environmental responsibility while delivering meaningful economic and technological benefits to Imperial Valley. We are committed to public participation, and continued dialogue with community stakeholders. We welcome public input and will respond with facts, documentation, and enforceable operational commitments where appropriate. We will participate in community meetings and coordinate with relevant agencies to ensure the data center campus is implemented responsibly. If residents or stakeholders have specific, project-related requests, we will consider them in good faith and respond promptly and substantively. Thank you for your attention and for your leadership.

Sincerely,

Imperial Valley Computer Manufacturing, LLC

Sebastian Rucci, managing member