

Champaign County  
Department of

**PLANNING &  
ZONING**

TO: **Data Center Activities Task Force**

FROM: **John Hall, Zoning Administrator**

DATE: **March 23, 2026**

RE: **Big Data Center Background Documents**

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**BACKGROUND**

Several background documents are attached.

Bennett Administrative Center  
102 East Main Street  
Urbana, Illinois 61801

(217) 384-3708  
zoningdept@co.champaign.il.us  
www.co.champaign.il.us/zoning

**ATTACHMENTS**

- A Existing Data Center requirements from the Champaign County Zoning Ordinance
- B C1 Sangamon I LLC Data Center Application to Sangamon County
- C Data Center Impact Analysis (for the C1 Sangamon I LLC Data Center)
- D City of Aurora, Illinois Summary of Proposed Changes for Data Centers
- E Draft Proposed Amendment for Big Data Centers (from the February 5, 2026, ELUC Meeting)



**SECTION 3.0 DEFINITIONS - CONTINUED**

**COURT**: An OPEN SPACE, other than a YARD, on the same LOT with a BUILDING, which is bounded on two or more sides by, but is not enclosed by, the walls of such BUILDING.

**COVERAGE**: The percentage of the LOT AREA covered by the BUILDING AREA.

**DATA CENTER**: A centralized location where computing and networking equipment is concentrated for the purpose of collecting, storing, processing, distributing or allowing access to large amounts of data.

**DISCRETIONARY**: A term to describe a decision requiring the exercise of judgment, deliberation or decision on the part of the BOARD and GOVERNING BODY in the process of approving or disapproving a SPECIAL USE or a rezoning request.

**DISCRETIONARY DEVELOPMENT**: A non-agricultural land USE that may occur provided that a SPECIAL USE permit and/or a rezoning request is granted by the BOARD and/or by the GOVERNING BODY following a DISCRETIONARY review process and additionally provided that the USE complies with provisions of the Zoning Ordinance and other applicable ordinances and regulations.

**DISPLAY**: The placement or arrangement of products or materials for sale or lease excluding items which are being stored while awaiting maintenance, or repair or other STORAGE.

**DISTRICT**: A section of the COUNTY/city/village in which zoning regulations and standards are uniform.

**DOCK, LOADING**: A platform-like STRUCTURE adjacent to a LOADING BERTH from which goods are loaded on and on which goods are unloaded from a vehicle parked in such LOADING BERTH.

**DWELLING**: A BUILDING or MANUFACTURED HOME designated for non-transient residential living purposes and containing one or more DWELLING UNITS and/or LODGING UNITS.

**DWELLING or PRINCIPAL BUILDING, PARTICIPATING**: A DWELLING on land that is leased to a WIND FARM.

**DWELLING or PRINCIPAL BUILDING, NON-PARTICIPATING**: A DWELLING on land that is not leased to a WIND FARM.

**DWELLING UNIT**: One or more rooms constituting all or part of a DWELLING which are used exclusively as living quarters for one FAMILY, and which contains a bathroom and kitchen.


**DWELLING, SINGLE FAMILY**: A DWELLING containing one DWELLING UNIT.



Champaign County, Illinois  
Zoning Ordinance

**SECTION 5.2 TABLE OF AUTHORIZED PRINCIPAL USES - CONTINUED**

Principal USES	Zoning DISTRICTS														
	CR	AG-1	AG-2	R-1	R-2	R-3	R-4	R-5	B-1	B-2	B-3	B-4	B-5	I-1	I-2
ADULT USE CANNABIS INFUSER ORGANIZATION <sup>25</sup>															
ADULT USE CANNABIS PROCESSING ORGANIZATION <sup>26</sup>															
ADULT USE CANNABIS CULTIVATION CENTER <sup>27</sup>	<b>B</b>	<b>B</b>	<b>B</b>						<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>
ADULT USE CANNABIS CRAFT GROWER <sup>28</sup>	<b>B</b>	<b>B</b>	<b>B</b>						<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>	<b>B</b>
Agronomic Research and Training Facility		<b>S</b>	<b>S</b>												
<b>Business Uses: Business, Private, Educational, and Financial Services</b>															
Artist Studio			<b>S</b>							<b>S</b>			<b>S</b>		
Banks, Savings and Loan Associations															
Insurance and Real Estate Offices															
Business Office															
Professional Office															
Private Kindergarten or Day Care Facility				<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>							
Vocational, Trade or Business SCHOOL															
RESIDENTIAL RECOVERY CENTER			<b>S</b> <sup>19</sup>												
DATA CENTER			<b>S</b>								<b>S</b>			<b>S</b>	
<b>Business Uses: Food Sales and Service</b>															
Meat and Fish Market															
Restaurant (indoor service only)										<b>S</b>					
Supermarket or Grocery Store															
Wholesale Produce Terminal															
Drive-In Restaurant															
Tavern or Night Club															
Bakery (less than 2,500 SF)															
Bakery (more than 2,500 SF)											<b>S</b>				
Dairy Store															
Delicatessen															
Confectionery Store															
Retail Liquor Store															

 = Permitted by right    
 **S** = Permitted on individual LOTS as a SPECIAL USE    
 **B** = County Board SPECIAL USE Permit    
 **M** = Safety Moratorium (temporarily prohibited)



Champaign County, Illinois  
Zoning Ordinance

**SECTION 6.1.3 SCHEDULE OF STANDARD CONDITIONS FOR SPECIFIC TYPES OF SPECIAL USES -  
CONTINUED**

SPECIAL USES or USE Categories	Minimum Fencing Required <sup>6</sup>	Minimum LOT Size		Maximum HEIGHT		Required YARDS (feet)					Explanatory or Special Provisions	
		AREA (Acres)	Width (feet)	Feet	Stories	Front Setback from STREET Centerline <sup>2</sup>			SIDE	REAR		
						MAJOR	COLLECTOR	MINOR				
												<p>k. The method and equipment utilized to load recyclable and non-recyclable general construction or demolition for shipment from the CDDR FACILITY; and</p> <p>l. Typical and maximum anticipated height of stockpiled recyclable GENERAL CONSTRUCTION OR DEMOLITION DEBRIS for each recyclable material by type. Identification of the buffering and/or screening measures employed to minimize the visual impact of the proposed stockpiles from surrounding land USES.</p> <p>12. The SPECIAL USE Permit will become effective upon receipt of a permit from the Illinois Environmental Protection Agency in accordance with Section 22.38 of the Illinois Environmental Protection Act ("The IEPA Act"). It must be a condition of the SPECIAL USE Permit that the CDDR FACILITY continues to operate in accordance with Section 22.38 of the IEPA Act and all other regulations and applicable permits.</p>
Contractors Facilities with or without Outdoor STORAGE and/or Outdoor OPERATIONS	NR	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	*See below
												<p>1. In all DISTRICTS other than the B-5 DISTRICT, outdoor STORAGE and/or outdoor OPERATIONS are allowed as an ACCESSORY USE subject to subsection 7.6.</p> <p>2. In the B-5 DISTRICT, outdoor STORAGE and/or OPERATIONS are allowed as an ACCESSORY USE provided as follows: A. No outdoor STORAGE and/or outdoor OPERATIONS shall be visible from any second floor DWELLING UNIT. B. Outdoor STORAGE and/or outdoor OPERATIONS may be located at the property line but shall be screened by a Type D SCREEN consistent with 4.3.3.H.1.</p>
DATA CENTER	NR	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	*See below
												<p>1. The location of the DATA CENTER must be approved in writing by the relevant Fire Protection District.</p> <p>2. The petitioner shall provide the P&amp;Z Department with a written explanation of security features for the DATA CENTER.</p> <p>3. DATA CENTERS constructed with PV SOLAR ARRAYS shall be located adjacent to the solar inverter and as far as possible from property lines and adjacent DWELLINGS consistent with good engineering practice.</p> <p>4. Noise levels from any DATA CENTER shall be in compliance with the applicable Illinois Pollution Control Board (IPCB) regulations (35 Illinois Administrative Code, Subtitle H: Noise, Parts 900, 901, 910). A. Any applicant located within 1,500 feet of a DWELLING shall submit a noise analysis by a qualified professional that demonstrates compliance with the IPCB noise regulations similar to the requirements of Section 6.1.5I.(3). The analysis shall include manufacturer's sound power level characteristics and other relevant data regarding noise characteristics of proposed DATA CENTER equipment. B. Enforcement shall follow protocols established in Section 6.1.5 I.(4) of the Zoning Ordinance.</p>
Electrical Substation	6' wire mesh	(1)	(1)	(1)	(1)	(1)	(1)	(1)	20	20		
Fairground	6' wire mesh	20	(1)	(1)	(1)	100	100	100	50	50		*See below
												<p>Site design, land management, and storm water management designs and practices shall provide effective site drainage; shall meet or exceed state and federal water quality standards; shall protect downstream drainage patterns; shall provide for stream flows that support healthy aquatic ecosystems; shall minimize impacts on adjacent properties and cause no more than minimal disturbance to the stream corridor environment; and, shall wherever possible, preserve existing habitat, enhance degraded habitat, and restore habitat.</p>
Fertilizer manufacturing and bulk storage	NR	5	(1)	(1)	(1)	100	100	100	100	100		
Fuel Ethanol Manufacturing	NR	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	*See below





SANGAMON COUNTY, ILLINOIS

FOR ZONING OFFICE USE ONLY
DATE FILED: 10/10/2025
HEARING DATE: 2/19/2026
DOCKET #: 2025-019
PARCEL NUMBER: 33-29.0-200-001, 33-29.0-100-002, 33-20.0-400-002 & 33-20.0-300-003
CO. BOARD MEMBER: Craig Hall DISTRICT # 7

PETITION FOR:

AMENDMENTS, VARIATIONS,
X CONDITIONAL PERMITTED USES

Application Fee: \$250 first 5 acres / \$5 per additional acre or thereof

TO THE HONORABLE COUNTY BOARD OF SANGAMON COUNTY, ILLINOIS, AND TO THE ZONING BOARD OF APPEALS OF SANGAMON COUNTY, ILLINOIS:

Your Petitioner(s), CI Sangamon I LLC, respectfully petitions the Sangamon County Board for the above referenced relief with respect to certain real estate situated in Sangamon County, Illinois, legally described as follows:

See Exhibit M

S 1/2 of Section 20

N 1/2 of Section 29, Township 13 North, Range 7 West Current Zoning "A" Agricultural

1. Petitioner is the Property owner, X Contract purchaser or Other (Corporation LLC)
(if other specify: ) of the above described property

2. The common street address of said property is 13000 Block of Thayer Road, Waverly, IL 62692

3. Petitioner's Name CI Sangamon I LLC (Wholly owned subsidiary of CyrusOne)

Address 2850 N. Harwood Street, Suite 2200, Dallas, TX 75201

Daytime Phone # 469-289-2197

Email Address jhatem@cyrusone.com- John Hatem (contact)

4. Property Owner's Name John & Nancy Dowson Family II LP (33-29.0-200-001), JC Dowson Inc (33-29.0-100-002), JDI Farms Inc (33-20.0-400-002 & 33-20.0-300-003)

(if applicable)

Address 400 Reichert Road, Divernon, IL 62530 (address for all entities)

Daytime Phone # 217-652-0995

Email Address darrel@dowsonfarms.com - Darrel Thoma (Contact)

5. Representative's Name Bradd Hout
(if applicable)

Address 2850 N. Harwood Street, Suite 2200, Dallas, TX 75201

Daytime Phone # 312-446-4605

Email Address bhout@cyrusone.com

6. The existing land use is Agricultural

7. The proposed land use is Data Center Campus with On-Site Substation

8. Petitioner plans to modify the property as follows (explain and/or attach sketch):

Construction Construction of a data center campus with on-site substation

Additions \_\_\_\_\_

Division of Land \_\_\_\_\_

Other \_\_\_\_\_

9. Is public water available on the site? Yes X No \_\_\_\_

If yes, who is the provider? Apple Creek Rural Water Cooperative

10. Is public sanitary sewer available on the site? Yes \_\_\_\_ No X

If yes, who is the provider? \_\_\_\_\_

11. Give an explanation of why this request is being made: CyrusOne is pursuing the construction of a data center campus across 280 acres. Conditional Permitted Use is required to establish data centers as an approved use in this zoning district.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**PURSUANT TO CHAPTER 17.68 AMENDMENTS** ( X ) NA

12. Petitioner and fee owner wish to have the property rezoned from \_\_\_\_\_ District to \_\_\_\_\_ District.

13. Explain why the rezoning is appropriate:

(A) Are there similar nearby uses? \_\_\_\_\_  
\_\_\_\_\_

(B) Is the same or more intense zoning classification present in the area? \_\_\_\_\_  
\_\_\_\_\_

(C) Why is the existing classification inappropriate? \_\_\_\_\_  
\_\_\_\_\_

(D) Is there a trend toward the type of use proposed? \_\_\_\_\_  
\_\_\_\_\_

**PURSUANT TO CHAPTER 17.66 VARIATIONS**

( X ) NA

14. The following bulk requirement variances are requested (specify proposed yards to the nearest foot): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

15. Explain why the requested bulk requirement variance is appropriate:

(A) Can the land in question be put to a reasonable use if it is used in compliance with the ordinance? \_\_\_\_\_  
\_\_\_\_\_

(B) Are there circumstances unique to the property, which are not applicable to other property in the area which justify the bulk requirement variance? \_\_\_\_\_  
\_\_\_\_\_

(C) Would the granting of the bulk requirement variance cause any adverse impact on surrounding property or alter the essential character of the area? \_\_\_\_\_  
\_\_\_\_\_

**PURSUANT TO CHAPTER 17.58 CONDITIONAL PERMITTED USES** ( ) NA

16. The following CPU is requested: Data Center Campus with On-Site Substation \_\_\_\_\_

17. Explain why the CPU is appropriate:

(A) Is the CPU so proposed that the proposed location, design and method of operation will minimize the adjacent effects on the character of the surrounding area? See attached Conditional Permitted Use Application Narrative \_\_\_\_\_  
\_\_\_\_\_

(B) Is the CPU so proposed to be operated, designed and located so that the public health, safety, and welfare will be protected? See attached Conditional Permitted Use Application Narrative \_\_\_\_\_  
\_\_\_\_\_

(C) Will the CPU cause substantial injury to the value of other property in the vicinity in which it is located? \_\_\_\_\_

See attached Conditional Permitted Use Application Narrative \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(D) Special Findings for Conditional Permitted Uses pursuant to Section 17.58.080(D):

- (1) Fairgrounds, public or private outdoor recreation centers: Will the principal vehicle access for such use be located on a major thoroughfare or a secondary thoroughfare or within one-quarter mile of a major thoroughfare that such use is so located as to draw a minimum of vehicular traffic to and through minor and collector streets in residential areas?

N/A

- (2) Manufactured home parks: Will the requirements of Chapter 17.48, Large Scale Developments, be met?

N/A

- (3) Tourist homes, motels and hotels: Will the use be located within 400 feet of a major thoroughfare?

N/A

- (4) Taverns and liquor stores: Will the following distances be maintained: 1) schools – 100' from the property line of the school to the property line of the tavern or liquor store; 2) churches – 100' from the church building to the tavern or liquor store building; 3) residences – 100' from the tavern or liquor store property line to the residential structure or institutional care facility?

N/A

- (5) Adult-use cannabis business establishments: Will the following distances be maintained from the principal structure of an adult-use cannabis business establishment to the property line of a use defined in Chapter 17.04 as a "sensitive area"?

- i) Adult-use cannabis craft grower – 1,500 feet;
- ii) Adult-use cannabis cultivation center – 1,500 feet
- iii) Adult-use cannabis dispensing organization (dispensary) – 250 feet
- iv) Adult-use cannabis infuser organization (infuser) – 1,500 feet
- v) Adult-use cannabis processing organization (processor) – 1,500 feet
- vi) Adult-use cannabis transporting organization (transporter) – 1,500 feet

- \* On-premise consumption of cannabis at cannabis dispensing organizations and smoking lounges in unincorporated Sangamon County is prohibited.

N/A

Print Name: John Hatem

Signature: Signature on File

Date: 10/06/2025

**REQUIRED DOCUMENTS**

- Legal Description (May be obtained at the Sangamon County Recorder's Office)
- Letter of property owner(s) consent and notarized (stating all owners listed on property are in agreement of the petition)
- If not the property owner; a form of consent is required (i.e. contract or lease agreement)
- Corporation Members (if applicable)
- Site Plan
- Business Plan (if applicable)
- Parking Plan (if applicable)
  - o Type of Surface Material: Asphalt with concrete curbs
  - o Number of Spaces: Minimum of 272 parking spaces & 16 loading bays across campus
  - o Total Square Footage: ~ 100,000 SF for Parking Spaces and Loading Bays
- Petitioner Checklist

# C1 Sangamon I LLC

2850 N. Harwood Street, Dallas, TX 75201

January 22, 2026

Mr. Trustin Harrison  
Zoning Administrator  
Sangamon County Building & Zoning  
200 S. 9<sup>th</sup> Street – Room 234  
Springfield, IL 62701  
Trustin.Harrison@sangamonil.gov

**RE: CyrusOne – C1 Sangamon I LLC: Sangamon County, IL Project Summary**

Dear Mr. Harrison,

C1 Sangamon I LLC, the applicant ("Applicant"), submits this supplemental narrative and other materials in support of its previously submitted application for a Conditional Permitted Use approval for a data center campus ("Project") in Sangamon County, Illinois. The Applicant is a wholly owned subsidiary of CyrusOne. CyrusOne is a global owner, operator, and developer of data center campuses based in Dallas, Texas. The enclosed drawings and documents include the following:

Drawings (Revised):

- Exhibit A: Conceptual Site Layout
- Exhibit B: Conceptual Site Details
- Exhibit C: Vacated Lot Lines
- Exhibit D: Grading Plan
- Exhibit E: Utility Plan

Documents:

- Exhibit F: Sangamon County Highway Department Approval Letter
- Exhibit G: Load Letter prepared by Strategic Mission Critical
- Exhibit H: Sangamon County Department of Public Health Approval Letter
- Exhibit I: Will Serve Response Letter from Rural Electric Convenience Cooperative.
- Exhibit J: Will Serve Response Letter from Apple Creek Water Cooperative
- Exhibit K: Noise Study prepared by Trinity Consultants
- Exhibit L: Project Labor Agreement ("PLA") Commitment Letter

Over the course of the past three months the Applicant has conducted extensive stakeholder engagement and incorporated revisions that address feedback received by those that have participated in this process. We have also incorporated revisions intended to address the county staff comments based on the original submittal.

## I. Project Overview

CyrusOne is under contract to purchase 280 acres across four parcels ("host parcels") that will accommodate the construction of a four (4) building data center campus with on-site substation. In response to stakeholder feedback, the campus plan was revised to orient the office portions of the building toward Thayer Road while modifying the building footprints to fit within four development pads instead of six. This modification will allow the Applicant to (a) increase our setback along Thayer Road and at the northwest corner of the host parcels (b) create a more attractive façade along Thayer Road, and (c) reduce our projected water consumption by 24%. Despite the change in the number of buildings, the overall building square footage remains comparable, and the revisions made to these plans do not affect CyrusOne's previously stated projected investment or job totals.

The host parcels are located in Talkington Township in unincorporated southwest Sangamon County and are all zoned Agricultural. The campus will be developed in phases in alignment with customer needs and available grid capacity with a projected construction start date in 2026. Once construction commences, we will typically construct one building per year until we reach full capacity, subject to the availability of power and confirmation of customer interest.

If approved, the data center campus will bring significant benefits to Sangamon County and the communities surrounding the facility. More specifically, the Project will create over 500 construction jobs over a five-to-seven-year construction period to build the data center campus and 100 permanent, full-time jobs to operate the data center after it is constructed. The Project will require the support of local businesses to provide regular testing and maintenance activities for on-site mechanical, plumbing and electrical systems. The Applicant will also rely on local businesses for landscaping, cleaning and other essential building maintenance services. The local businesses that provide these services will require additional staff to meet the demands created by this facility which will add a significant number of indirect jobs and additional economic impact. As a result of CyrusOne's investment, the Project is estimated to generate over \$98 million in property taxes during the first 20 years of operation. The property taxes from the Project will generate significant new tax revenue for Sangamon County, North Mac School District, Talkington Township, Talkington Road and Bridge District, Virden Fire District, Lincoln Land Community College and other local taxing jurisdictions in the vicinity of the host parcels.

CyrusOne is committed to water conservation and the revised design included in this submittal will reduce water consumption by 24% compared to the original site plan. The Applicant will invest in water restoration projects that directly benefit Waverly Lake, which is the primary source of water for the Apple Creek Water Cooperative. Additionally, the company is committed to infrastructure upgrades within the Cooperative's service territory to improve the system's quality and resiliency.

With respect to emergency preparedness, the company is coordinating with the Virden Fire District and the Sangamon County Office of Emergency Management to ensure that the training and equipment needs of first responders are met. The Applicant plans to voluntarily contribute to a program that will provide funding to fire districts within Sangamon County that wish to receive supplemental training from the University of Illinois Fire Training Institute. We have also offered tours to local leaders of these agencies should they wish to learn more about our facilities before they are built.

CyrusOne prides itself on being a good corporate citizen and is seeking other opportunities to make a direct positive impact in Sangamon County. CyrusOne offers its employees paid volunteer days to allow them to support local causes important to them and make direct corporate contributions to local non-profit organizations that serve the community's needs. Through thoughtful leadership, design, and execution, the Applicant has designed a low-impact Project that will provide a significant number of benefits relative to other uses.

Each building at the data center campus will feature roof lines, mechanical equipment and screening that will range between 40 to 60 feet tall. Noise attenuation measures will be installed to maximize building performance while also improving the overall aesthetics of the buildings. Building designs may change over the course of the development timeline to meet technological advances and customer demands but are expected to remain within these height ranges. Cooling equipment for the facility will be located on the roof behind screening. Each building is currently designed to be supported by 105 backup electric generators, which will be housed outside of each building within sound attenuation enclosures. Buildings will be set back from the property boundaries to comply with the local data center regulations and to avoid the potential impact on neighboring land uses.

The campus will include security fencing along the perimeter and will be secured 24/7. In addition to detention ponds on site, landscaping features will be included in the design to meet Sangamon County standards. A portion of the campus landscaping will include pollinator and wildlife friendly plants to meet the company's biodiversity standards established under their basis-of-design. Prior to applying for a building permit, the Applicant will consult the Illinois Pollinator-Friendly Solar Site Act to determine how it aligns with its current standards and determine opportunities to meet scoring metrics defined within those standards. All exterior lighting on the property will face downward with fixtures selected in accordance with dark sky compliance standards. A minimum of 272 parking spaces and 16 loading bays will be created on site with private roads and sidewalks providing circulation throughout the campus. A summary table showing the number of proposed parking spaces is shown at the top right-hand corner of the drawing labeled "Exhibit A". All internal roads and sidewalks will be constructed by CyrusOne.

The Applicant has coordinated with Sangamon County's Engineer to receive conceptual approval for the campus as demonstrated in the enclosed letter dated November 21, 2025 ("Exhibit F"). Upon receiving the requested Conditional Permitted Use approval, the Applicant will complete final engineering drawings and submit for the applicable permit approvals from the County Engineer's office. The Applicant's final plans will comply with all applicable Sangamon County and State of Illinois requirements where applicable.

The campus is designed to avoid impacts on neighboring properties and meets the county's special requirements for data centers and the standards for approval of a Conditional Permitted Use. Please see the following Section II that addresses key components of the Project and its operations. In addition, attached please see an Appendix that demonstrates how the Project will meet the comply with Sangamon County's zoning ordinance's standards for siting a data center and the standards for issuing a Conditional Permitted Use.

## II. Compliance with Specific Key Issues

## NOISE

The primary sources of noise on the campus will be from cooling equipment and generators that serve each building. Noise mitigation measures will be installed at chiller and generator locations to meet the county and Illinois Pollution Control Board sound limits (both daytime and nighttime limits). The Applicant has retained a noise consultant to prepare a sound study to confirm that the Project will meet all applicable sound limits. A copy of the report prepared by Trinity Consultants detailing the projected noise levels is provided in this resubmittal ("Exhibit K").

## WATER

CyrusOne utilizes a closed-loop cooling technology that minimizes water consumption for cooling purposes. Each building will require a one-time initial fill of approximately 150,000 gallons. Once the system is filled it is treated periodically with microbicides and corrosion inhibitors to ensure the cooling system remains operational. After treatments, the system remains 99.9% water.

Domestic water usage for each building is projected to be 2,867 gallons per day (GPD) under a "peak" condition but will average 1,154 GPD under standard operating conditions. Accounting for all four enlarged/revised buildings, the campus is designed to utilize up to 11,504 GPD under "peak" conditions while the average usage is projected to be 4,616 GPD. Domestic water will be used primarily for restrooms, humidification, and other basic facility operations.

Water required for fire suppression will be provided by an on-site water tank containing non-potable water accompanied by fire pumps. The size of the water tank will be approximately 480,000 gallons. The filling of the tank will be coordinated in advance with the local water service provider. If capacity is not available to fill the tank when needed, then off-site water will be delivered by water trucks to complete the fill. The water piping for fire suppression needs is separate from the potable water used for domestic purposes and never mixes.

A detailed load letter summarizing the projected water usage referenced above was prepared by Strategic Mission Critical and is enclosed with this submittal ("Exhibit G"). The Applicant is committed to achieving net zero water usage for this campus by investing in local or regional water restoration projects. More specifically, the Applicant is discussing arrangements to fund improvements to Waverly Lake and system upgrades within the service territory of the Apple Creek Water Cooperative. A formal response to our will-serve letter request from the Cooperative is included with this submittal and attached as Exhibit J. In the event we do not subsequently execute a contract for service, the Applicant will seek alternative means of water which may include the periodic delivery of off-site potable water to on-site holding tanks to serve the minimal water demands of the campus.

Domestic wastewater discharges from the campus will be processed by an on-site septic system consisting of approximately 5 acres. The conceptual plans for the septic system including the proposed location and loads were conditionally approved by the Sangamon County Department of Public Health as demonstrated in the enclosed letter ("Exhibit H"). Final approval for the construction of the septic system is contingent upon completion of the system design and procurement of the applicable permits from that department.

## **ELECTRIC SUPPLY**

With respect to power usage, the campus will utilize up to 634 MW at full buildout. Power will be provided by Rural Electric Convenience Cooperative (RECC). RECC is served by transmission lines that are owned and maintained by Ameren. Ameren is a member of the Midcontinent ISO ("MISO") Regional Reliability Area. MISO is responsible for approving large loads within Ameren's transmission network territory and MISO has confirmed that the projected capacity can be served and will not create reliability issues for the region. The location was specifically selected due to its proximity to existing power infrastructure that can support a large load customer with minimal upgrades or impact to the electric grid. CyrusOne will pay for transmission and network upgrades that are specifically required to serve the Project. RECC has provided guidance to its members demonstrating that the Project will not increase power rates for their members and rate payers and has also provided a will-serve letter for the Project ("Exhibit I")

## **FIBER**

The campus will require fiber optic network service from at least two separate providers. The specific providers that will serve the campus will be determined via an RFP process conducted by CyrusOne, its tenants and vendors. The extension of fiber optic networks to this area will dramatically increase the availability of high-speed internet service to those that live and conduct business in the surrounding area. The line extensions will be paid for by the Applicant and its tenants.

## **EMPLOYMENT AND ECONOMIC IMPACT**

With respect to employment, the project will create over 100 new permanent positions and require the services of 500+ construction personnel continuously throughout the development cycle. The jobs that the Project will create provide opportunities for people with a range of backgrounds and experience with some only requiring a certification to unlock upward advancement. Other positions that are highly technical or managerial in nature will require individuals with advanced certifications and degrees that command higher salaries. Throughout the lifecycle of the construction phase, CyrusOne will leverage the local construction and labor workforce and has committed publicly to entering into Project Labor Agreements ("PLAs"). A letter demonstrating this commitment is enclosed as an attachment to this submittal for reference ("Exhibit L").

CyrusOne has stated publicly that it intends to invest a minimum of \$500 million in the development of this site. Sangamon County's tax assessor has estimated that this will generate property tax revenue of \$98,524,871 over 20 years. The Project does not create a significant need for new housing, schools or services but provides a significant infusion of funds to local governments and taxing jurisdictions that serve residents in and around the host parcels.

### **III. Summary**

CyrusOne is proud to employ and support hundreds of workers and families in Illinois and is currently deploying over \$1 billion in capital elsewhere throughout the state, supporting thousands of construction jobs. Across the globe, the company supports hundreds of other employees and workers. We are a proven

and respected operator in the data center industry and are excited about the economic benefits and transformative impact we can bring to this region.

As demonstrated in this letter, we are confident that this project can fit within the framework the community would expect for a data center in Central Illinois. We look forward to delivering a lasting and meaningful impact in Sangamon County and appreciate your consideration of this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Hatem", with a stylized flourish at the end.

John Hatem

President, CyrusOne

## APPENDIX

### RESPONSES TO STANDARDS FOR APPROVAL

#### 17.58.080 Standards For Granting; Generally

No conditional permitted use shall be granted by the county board unless the conditional permitted use:

1. Is the CPU so proposed that the proposed location, design and method of operation of such use will minimize the adjacent effects on the character of the surrounding area;

**Response:** The proposed data center campus is located directly north of a 4,000-acre utility scale solar farm that includes an existing substation interconnected to a MISO regulated 345 kV transmission system. Within a one-mile radius of the proposed campus, there is a total of seven residential structures with the two closest structures being either vacant or abandoned. The closest occupied structure is located ~3,450 feet (0.65 miles) northeast of the site.

A data center campus is compatible with the utility scale solar farm, substation and transmission infrastructure that's immediately adjacent to the site. MISO has confirmed that the transmission system in the region is sufficient to serve the project and will not create an adverse impact on the region. The significant buffers and setbacks to residential buildings within one mile of the Project will ensure that the character of the surrounding area is maintained and that the use is compatible with the infrastructure that exists in the area today. Additionally, noise attenuation measures and dark-sky compliant lighting further confirm the minimization of adjacent effects to nearby residents.

In addition, the Project will operate within applicable limits for environmental regulations, such as noise and air emissions, which will result in the Project operating in a low-impact manner.

2. Is the CPU so proposed to be operated, designed and located so that public health, safety, and welfare will be protected?

**Response:** The Project will promote the general welfare of the Sangamon County by producing new construction jobs, long term employment opportunities and significant new tax revenue streams. The data center facility has been designed to be a good neighbor with minimal environmental impact – it will be set back from neighboring properties sufficiently to avoid impacting activities and uses on those properties. The Project is strategically located adjacent to existing infrastructure to minimize the need for large line extensions or upgrades. In addition, the facility will be completely fenced in and subject to security on a 24-hour basis.

Operationally, the project will incorporate engineering controls and best management practices that are designed for compliance, safety, and minimizing environmental impacts. These include air pollution controls on emergency generators, secondary containment on fuel storage tanks, stormwater management features, routine inspections of equipment, standardized monitoring and maintenance procedures, and employee training on industry best practices.

3. Will the CPU cause substantial injury to the value of other property in the vicinity in which it is located;

**Response:** The Project will be operated in a way that will not cause any injuries to neighboring properties in the vicinity and that will not interfere with uses on neighboring properties. The current site plan shows that the facility's infrastructure will be located at least 150 feet from neighboring property lines. The closest residential structure is an abandoned house located 1,845 feet from the property line. The Project will also comply with all applicable sound limits as well as applicable stringent air emission limits. As a result, given the Project's isolated location and its compliance with environmental requirements, including sound, the Project will not cause any injuries to properties within the vicinity of the Project.

In addition, the proposed data center will bring many benefits that should enhance the value of property in the vicinity in which it is located. A summary of these benefits includes the following: (1) Access to fiber optic networks from new carrier line extensions to the area that are funded by the company and its tenants; (2) direct funding to local water authority projects that improve the quality and resiliency of the water source that serves the immediate area; (3) tax revenue that supports Talkington Township, Talkington Road and Bridge, Grand Prairie Library, Virden Fire District, Lincoln Land Community College, North Mac School District and Sangamon County; (4) the campus facility will create permanent, full-time jobs for workers that live within driving distance of the campus, and the demand for housing and other services that results from this economic activity will bolster the demand for housing and support services in the vicinity of the Project; and (5) the Project will stabilize power rates for RECC customers and provide RECC with the funds needed to invest in reliability upgrades or to provide credits to its customers and will reduce the risk and need for pricing fluctuations.

4. In addition to the above general standards for all conditional permitted uses that may be allowed, no conditional permitted use listed below shall be granted unless the proposed use can meet the standards as noted:

1. Fairgrounds, public or private outdoor recreation centers - that the principal vehicle access for such use is located on a major thoroughfare or a secondary thoroughfare or within one-quarter mile of a major thoroughfare, that such use is so located as to draw a minimum of vehicular traffic to and through minor and collector streets in residential areas.
2. Manufactured home parks - must meet the requirements of Chapter 17.48, Large Scale Development, of this title.
3. Tourist homes, motels, hotels - that the proposed use must be located on or within four hundred (400) feet of a major thoroughfare.

4. Taverns and liquor stores - that the following distances be maintained: 1) schools - one hundred (100) feet from the property line of the school to the property line of the tavern or liquor store; 2) churches - one hundred (100) feet from the church building to the tavern or liquor store building; and 3) residences - one hundred (100) feet from the tavern or liquor store property line to the residential structure or institutional care facility.
5. Adult-use cannabis business establishments as defined in Chapter 17.04:
  1. that the following distances be maintained from the principal structure of an adult-use cannabis business establishment to the property line of a use defined in Chapter 17.04 as a "sensitive area":
    1. Adult-use cannabis craft grower – 1,500 feet
    2. Adult-use cannabis cultivation center – 1,500 feet
    3. Adult-use cannabis dispensing organization (dispensary) – 250 feet
    4. Adult-use cannabis infuser organization (infuser) – 1,500 feet
    5. Adult-use cannabis processing organization (processor) – 1,500 feet
    6. Adult-use cannabis transporting organization (transporter) – 1,500 feet
  2. On-premise consumption of cannabis at cannabis dispensing organizations and smoking lounges in unincorporated Sangamon County is prohibited.

*Response:* None of these additional standards apply.

## COMPLIANCE WITH SPECIAL REQUIREMENTS FOR DATA CENTERS

### 17.39.020 Special Requirements

Data Centers are subject to the following requirements:

A. Height. Shall not exceed one hundred (100) feet including any roof-mounted equipment or antennas.

*Response:* The building height inclusive of any roof-mounted equipment or antennas will not exceed 100 feet. The current building design utilized by CyrusOne features rooflines at 45 feet or less with mechanical equipment and enclosures at 60 feet or less.

B. Setbacks.

1. Perimeter Setback: The front, side, and rear yard setbacks shall be a minimum of one hundred fifty (150) feet from the property lines which form the outside perimeter of a Data Center Project Area.

**Response:** The current site plan more than complies with these minimum setbacks – the facility's infrastructure will be located at least 150 feet from neighboring property lines.

**2. Residential Structure Setback:** Data Centers of twenty-five (25) feet or less in height shall be setback seven hundred fifty (750) feet from the Data Center project property line to a residential structure. Data Centers greater than twenty-five (25) feet in height shall be setback from residential structures thirty (30) times the height of the Data Center. However, suppose the developer of the facility can obtain and record with the Sangamon County Recorder a written, signed, and notarized statement from the owner of the property containing said structure waiving this setback. In that case, the minimum setback from said structure shall be reduced to two hundred (200) feet.

**Response:** The proposed site plan complies with this requirement. The closest residential structure is an abandoned house located 1,855 feet from the property line. The actual data center building setback from this residence exceeds the minimum requirement of 1,800 feet using a maximum building height of 60 feet (30 x 60 feet = 1,800 foot setback from the nearest data center).

**C. Fencing.** A fence of at least six (6) feet in height shall enclose and secure the Data Center and must comply with Chapter 17.44.

**Response:** Fencing will be 8 ft tall Ameristar Impasse II (or similar) fencing. The height, type and location of the fencing comply with Chapter 17.44.

**D. Screening.** A landscaping screen shall be provided for any part of the Data Center that is visible to and located within five hundred (500) feet of an existing dwelling. The landscaping screen shall be located between the required fencing and the perimeter of the Data Center Project Area. The screening shall include a continuous line of native evergreen foliage, and/or native shrubs, and/or native trees, and/or any existing wooded area. The landscaping shall not be required if the Data Center is not visible to a dwelling by virtue of the existing topography as determined by the Sangamon County Zoning Administrator.

**Response:** There are no dwellings within 500 feet of the Project. The closest residential structure is an abandoned house located 1,855 feet from the property line. A landscaping screen will be provided along the Thayer Road frontage outside of the curb cuts required for site and substation access and is called out on Exhibit B.

**E. Lighting.** If lighting is provided at the project, lighting shall be shielded and downcast such that the light does not spill onto the adjacent parcel.

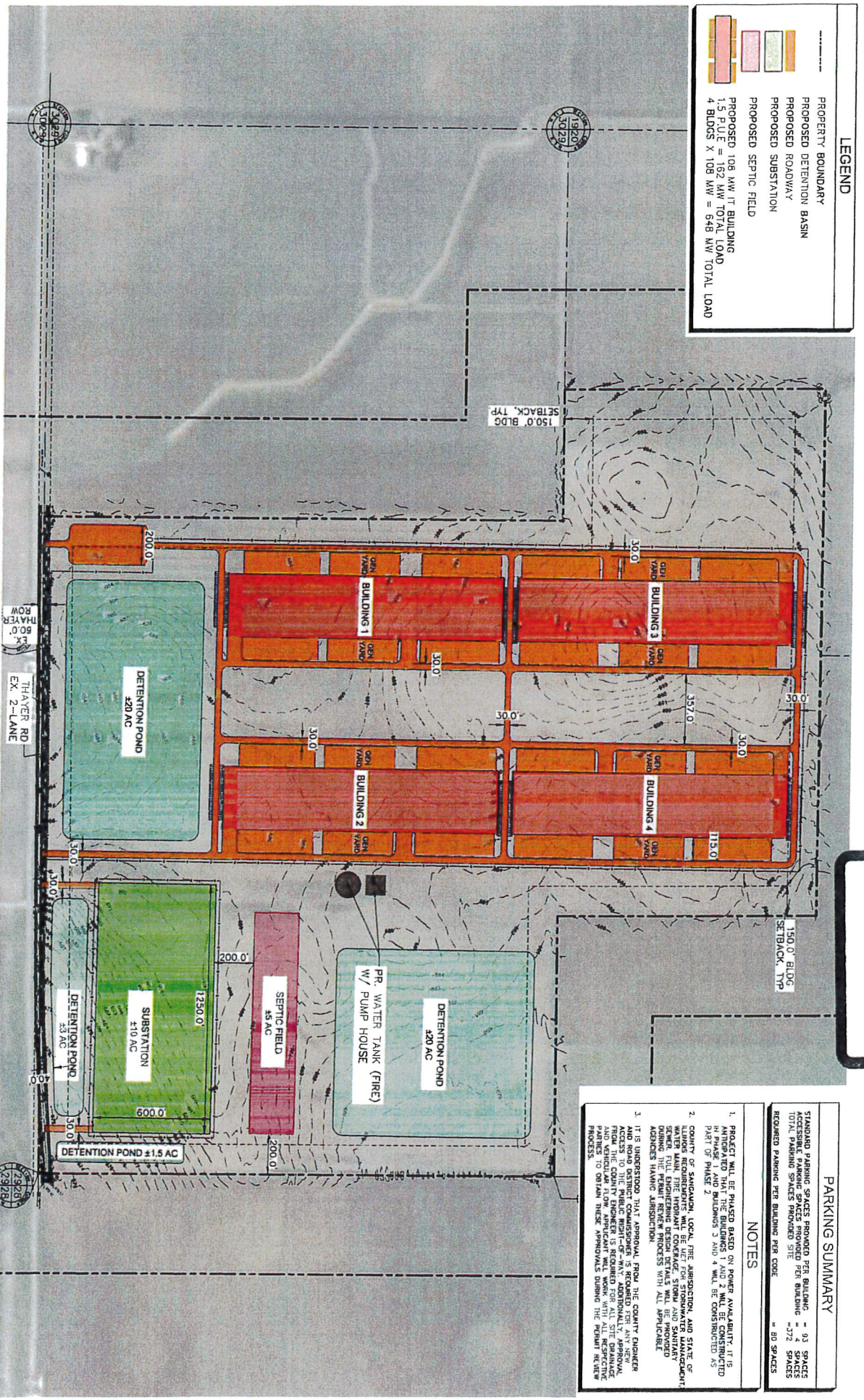
**Response:** The Applicant's lighting plan will utilize dark sky compliant lighting fixtures and comply with this standard.

**F. Noise.** Noise levels measured at the property line shall not exceed fifty (50) decibels when located adjacent to an existing residence or residential district. Noise levels shall be enforced by both the State of Illinois and Sangamon County.

**Response:** The Project will comply with the applicable standards set forth by Sangamon County and the State of Illinois. The Applicant has retained a noise consultant to prepare a sound study to confirm that the Project will meet all applicable sound limits. A copy of a report prepared by Trinity Consultants detailing the projected noise levels is provided in this resubmittal ("Exhibit K").

**G. Battery Energy Storage Systems (BESSs) may be considered an accessory use to the development. A BESS and a Data Center may be located on the same parcel without requiring a variance to allow multiple principal uses on a lot.**

**Response:** The Applicant has not sought approval to add a BESS facility to the proposed data center campus as part of its application. Should the Applicant elect to seek to add a BESS facility to the Project later, the Applicant will submit a separate application for a Conditional Permitted Use seeking approval to add the BESS facility. Note that the proposed facility will deploy Uninterruptable Power Supply ("UPS") cabinets that contain lead acid batteries to deliver temporary power while on-site emergency generators are starting up (~7 minutes or less).



**LEGEND**

- PROPERTY BOUNDARY
- PROPOSED DETENTION BASIN
- PROPOSED ROADWAY
- PROPOSED SUBSTATION
- PROPOSED SEPTIC FIELD

1.5 BLDGS = 108 MW TOTAL BUILDING LOAD  
 1.5 BLDGS = 162 MW TOTAL LOAD  
 4 BLDGS X 108 MW = 548 MW TOTAL LOAD

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**EXHIBIT**

A

**PARKING SUMMARY**

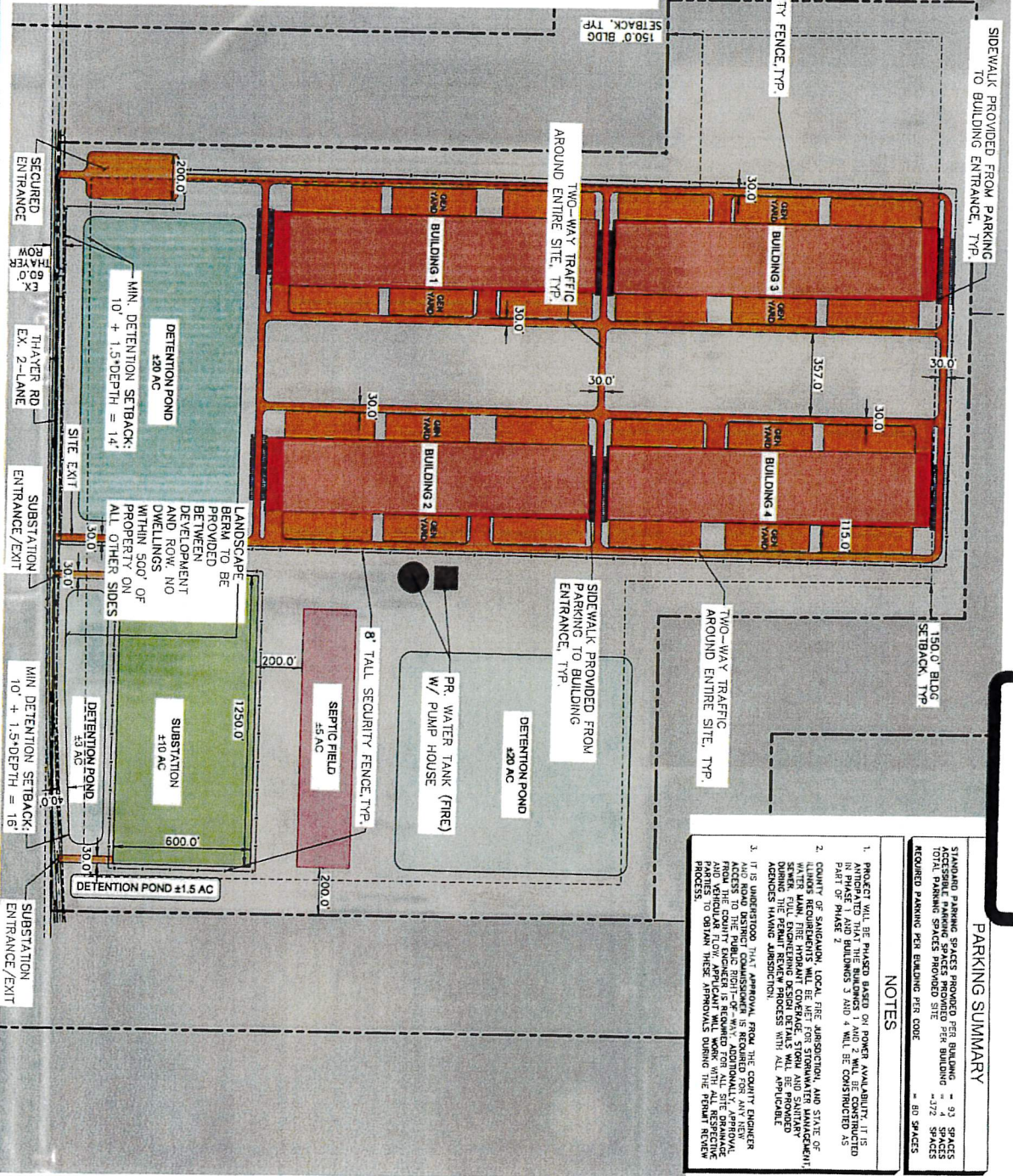
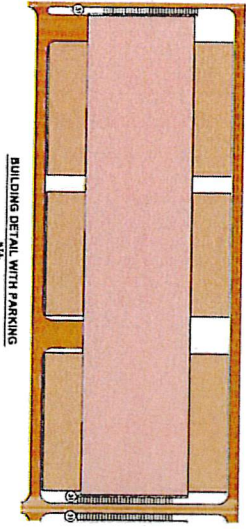
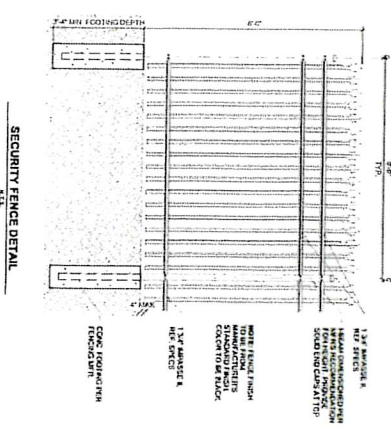
STANDARD PARKING SPACES PROVIDED PER BUILDING	= 93 SPACES
ACCESSIBLE PARKING SPACES PROVIDED PER BUILDING	= 4 SPACES
TOTAL PARKING SPACES PROVIDED SITE	= 97 SPACES
REQUIRED PARKING PER BUILDING PER CODE	= 80 SPACES

- NOTES**
- PROJECT WILL BE PHASED BASED ON POWER AVAILABILITY. IT IS ANTICIPATED THE BUILDINGS WILL BE CONSTRUCTED IN PHASE 1 AND BUILDINGS 3 AND 4 WILL BE CONSTRUCTED AS PART OF PHASE 2.
  - COUNTY OF SANGAMON, LOCAL TREE INSPECTION, AND STATE OF MISSOURI TREE INSPECTION REQUIREMENTS WILL BE MET FOR STORMWATER MANAGEMENT. SCENERY FULL ENGINEERING DESIGN DETAILS WILL BE PROVIDED DURING THE PERMIT REVIEW PROCESS WITH ALL APPLICABLE AGENCIES HAVING JURISDICTION.
  - IT IS UNDERSTOOD THAT APPROVAL FROM THE COUNTY ENGINEER FROM THE COUNTY ENGINEER IS REQUIRED FOR ALL SITE DRAINAGE ACCESS TO THE PUBLIC RIGHT-OF-WAY. ADDITIONAL APPROVAL PARTNERS TO OBTAIN THESE APPROVALS DURING THE PERMIT REVIEW PROCESS.



**LEGEND**

- PROPERTY BOUNDARY
- PROPOSED DETENTION BASIN
- PROPOSED ROADWAY
- PROPOSED SUBSTATION
- PROPOSED SEPTIC FIELD
- PROPOSED 108 MW 11' BUILDING
- 1.5 PILE = 162 MW TOTAL LOAD
- 4 BLDGS X 108 MW = 648 MW TOTAL LOAD



**PARKING SUMMARY**

STANDARD PARKING SPACES PROVIDED PER BUILDING	= 93 SPACES
ACCESSIBLE PARKING SPACES PROVIDED PER BUILDING	= 372 SPACES
TOTAL PARKING SPACES PROVIDED SITE	= 465 SPACES
REQUIRED PARKING PER BUILDING PER CODE	= 480 SPACES

- NOTES**
- PROJECT WILL BE PHASED BASED ON POWER AVAILABILITY. IT IS ANTICIPATED THAT THE BUILDINGS 1 AND 2 WILL BE CONSTRUCTED FIRST. BUILDINGS 3 AND 4 WILL BE CONSTRUCTED AS PART OF PHASE 2.
  - COUNTY OF SANGAMON, LOCAL FIRE JURISDICTION, AND STATE OF ILLINOIS REQUIREMENTS WILL BE MET FOR STORMWATER MANAGEMENT. FIRE HYDRANT COVERAGE, STORAGE AND SANITARY DURING THE CONSTRUCTION PERIOD DETAILS WILL BE PROVIDED TO THE PERMITTING AGENCIES WITH ALL APPLICABLE AGENCIES HAVING JURISDICTION.
  - IT IS UNDERSTOOD THAT APPROVAL FROM THE COUNTY ENGINEER AND ROAD DISTRICT COMMISSIONER IS REQUIRED FOR ANY NEW ACCESS TO THE PUBLIC RIGHT-OF-WAY. ADDITIONALLY, APPROVAL FROM THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND ILLINOIS DEPARTMENT OF NATURAL RESOURCES WILL BE REQUIRED FOR ALL RESPECTIVE PERMITS TO OBTAIN THESE APPROVALS DURING THE PERMIT REVIEW PROCESS.





Kimley»Horn

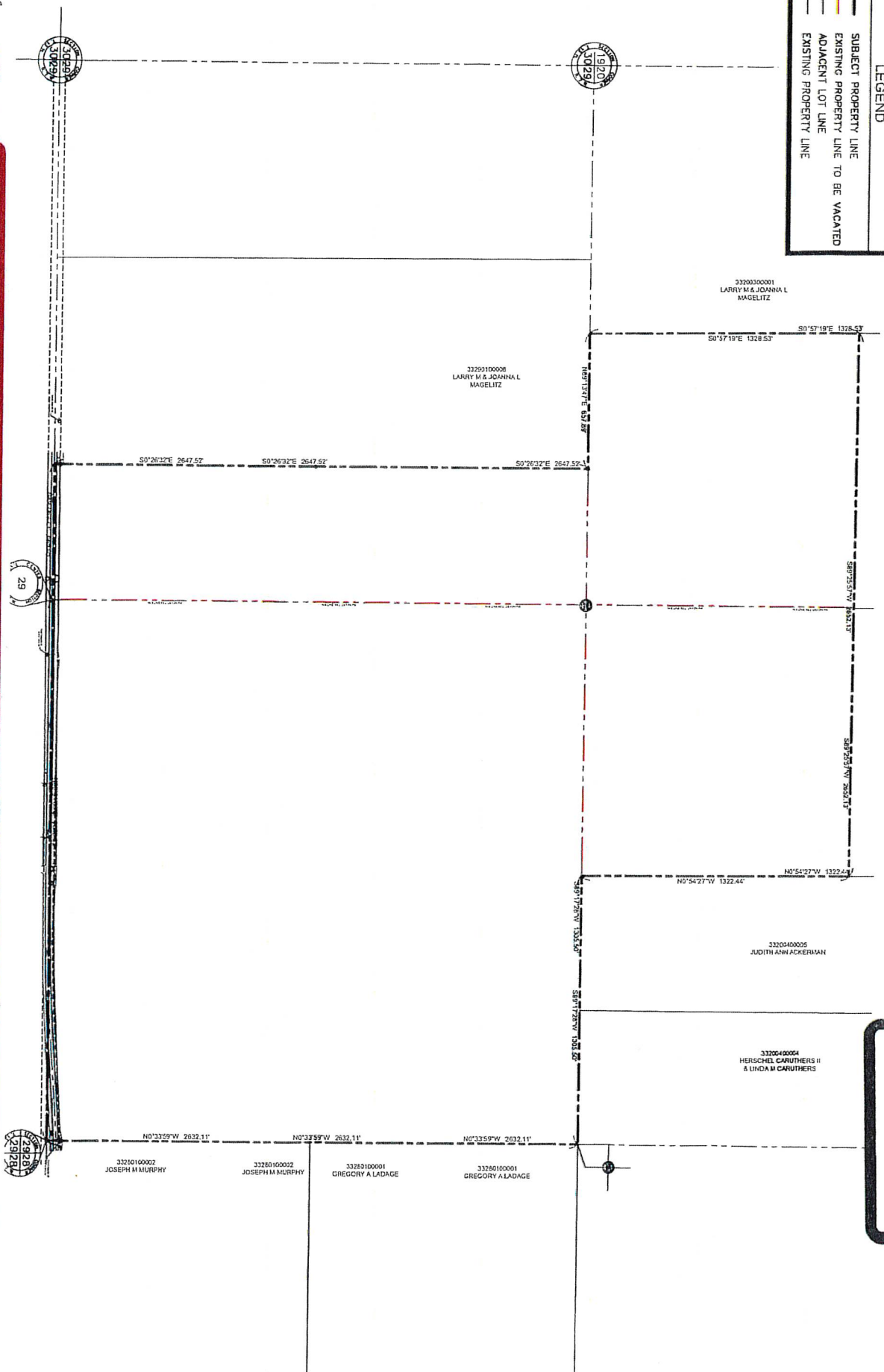
CONCEPTUAL SITE DETAILS - CYRUSONE SANGAMON COUNTY

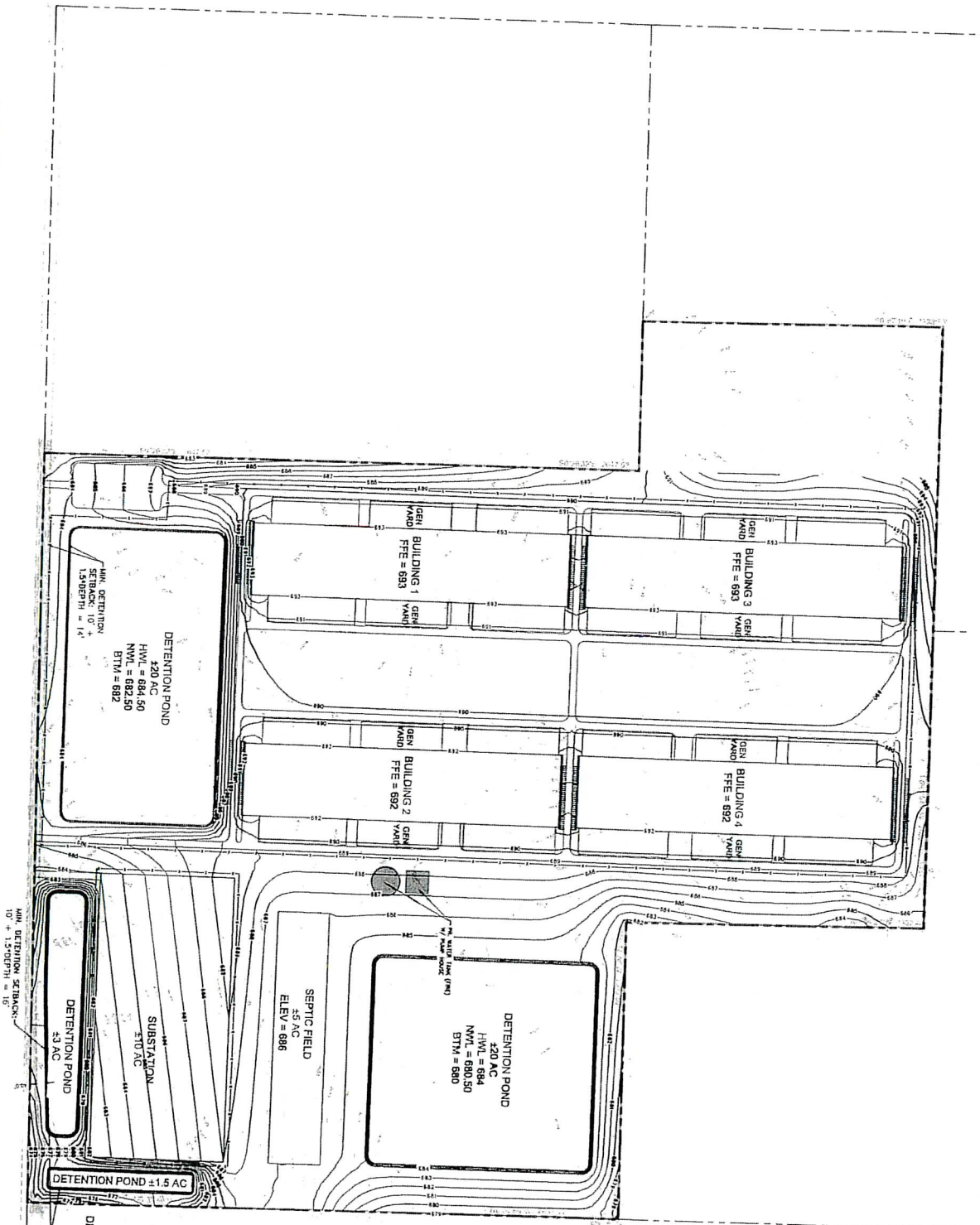
EXHB





LEGEND	
	SUBJECT PROPERTY LINE
	EXISTING PROPERTY LINE TO BE VACATED
	ADJACENT LOT LINE
	EXISTING PROPERTY LINE



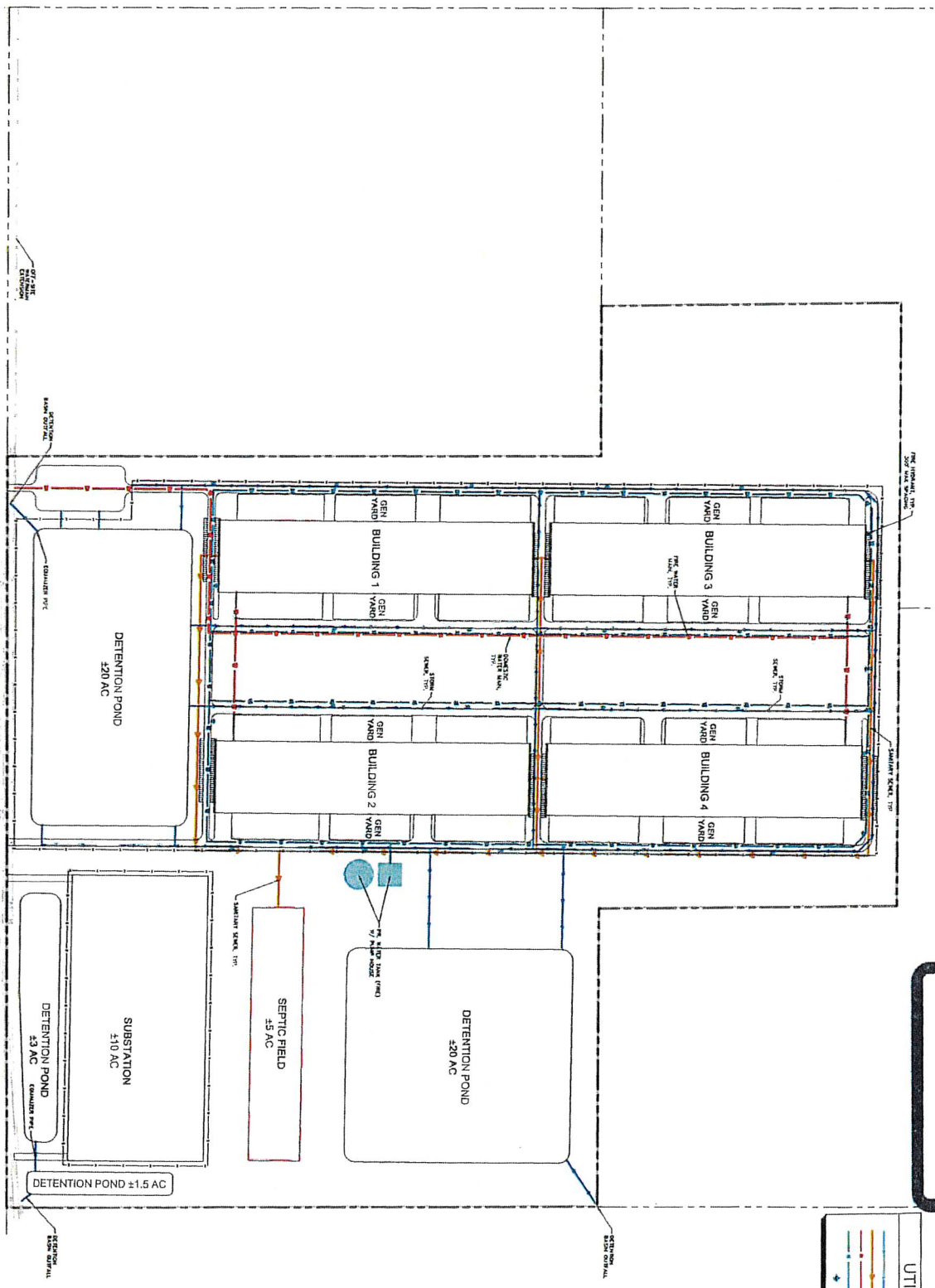


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**EXHIBIT**

D





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**EXHIBIT**

E

**UTILITY LEGEND**

	PROPOSED STORM SEWER LINE
	PROPOSED SANITARY SEWER LINE
	PROPOSED DOMESTIC WATER LINE
	PROPOSED FIRE WATER LINE
	PROPOSED FLOW DIRECTION



January 20, 2026

Steven Hall LEHP, BS.  
 Sangamon County Department of Public Health  
 Assistant Director of Environmental Health  
 2833 South Grand Ave East  
 Springfield, Illinois 62703

RE: Sangamon County, IL – 108MW Data Center  
 Water Usage Calculations

Dear Mr. Hall,

The water requirements calculated for the above-mentioned project are provided below & include the total loads expected for the building water & fire suppression demands. The fire suppression demand is comprised of the highest sprinkler demand of the building, including hose stream, as well as the site fire hydrants. The building water load comprises of usage of plumbing fixtures as well as mechanical humidification requirements. The building will be constructed in multiple phases, including an initial shell phase & future build-out phases. The initial shell phase will consist of a single unisex restroom & janitor’s closet, while additional planned plumbing fixtures & mechanical humidification will be installed in a future build-out.

The Total Peak Water Supply shows the worst-case flow rate accounting for the peak usage of all the plumbing fixtures within the building in addition to the mechanical humidifier sump basins being filled. The filling of the humidifiers considers conditions accounting for either the initial fill of the units or following the completion of a flush or dump cycle.

The Total Building Water Demand is the daily calculation comprising of the total gallons of water utilized per Full Time Employee (FTE) in addition to the water demands from the mechanical humidifier units. This is broken down between a worst-case peak day within the year and a typical day that can be expected throughout the year. The building demand per FTE assumes a 15 gallon per person per day usage of fixtures located within the building.

<b>(1) 108 MW Building Demand - Water Consumption</b>		
	<b>Peak</b>	<b>Average</b>
Peak Bldg FU's to GPM (Flush Valve) – Full Build	98	--
Add'l Total Mechanical – Humidification (GPM)	2	--
<b>Total Peak Water Supply (GPM):</b>	<b>100</b>	<b>--</b>
Full Time Employee (FTE) Load:	50	50
Building Demand Per FTE (GPD):	750	750
Mechanical Requirement (GPD):	2,126	404
<b>Total Building Water Demand (GPD):</b>	<b>2,876</b>	<b>1,154</b>
Annual Building Demand:		273,750
Annual Mechanical Demand:		147,402
<b>Total Annual Demand (Gallons):</b>		<b>421,152</b>



<b>Campus Total Demand</b>		
<b>(4) 108 MW Building Demand - Water Consumption</b>		
	<b>Peak</b>	<b>Average</b>
Building Occupant Demand (GPD):	3,000	3,000
Mechanical Requirement (GPD):	8,504	1,616
<b>Total Building Water Demand (GPD):</b>	<b>11,504</b>	<b>4,616</b>
Annual Building Demand:		1,095,000
Annual Mechanical Demand:		589,608
<b>Total Annual Demand (Gallons):</b>		<b>1,684,608</b>

The water demands shown for the fire suppression systems below are comprised of separate requirements for both the internal building sprinklers as well as the fire hydrants on site to accommodate a fire event on the premise.

<b>Fire Suppression Demand - Water Requirement</b>	
Building Sprinkler Demand, including hose stream (GPM)	1,400
Duration of Supply (Minutes)	90
Total Sprinkler Requirement (Gallons)	126,000
Fire Hydrants (GPM)	2,000
Duration of Supply (Minutes)	240
Total Hydrant Requirement (Gallons)	480,000

Sincerely,

*Gregory Wilhelm*

Gregory Wilhelm, CPD

EXHIBIT

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H



**Sangamon County Department of Public Health**

November 18, 2025  
Sangamon County, Illinois  
Planning and Zoning Division  
200 S. Ninth Street, 2<sup>nd</sup> Floor  
Springfield, IL 62701

**RE: Acknowledgement of Plan Review and Septic Location  
CyrusOne Data Center Campus on Thayer Road  
Talkington Township, Sangamon County, IL**

To Sangamon County Zoning Department:

Please accept this letter as acknowledgment from the Sangamon County Public Health Department that we have received and reviewed the plans (dated 11/7/25) provided by CyrusOne. The conceptual location and loads for the septic system are acceptable but remain subject to permit review and approval at a future date when construction drawings for the campus are finalized.

As referenced on our website, the construction of a private sewage disposal system will require that a permit application be submitted by a Licensed Septic Contractor with support from a Licensed Soil Scientist. The contractor who installs the system is responsible for compliance with the Illinois Private Sewage Disposal Licensing Act and Code, and with the Sangamon County Sewage Ordinance.

We will continue to work with the company's representatives and engineering team during the permitting and construction phases of the project.

If you have any questions please contact me at (217) 321-2601.

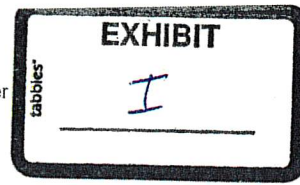
Thank you,

  
John Ridley

Director, Sangamon County Public Health

[www.scdph.org](http://www.scdph.org)


Main Campus: 2833 South Grand Avenue East | Springfield, IL 62703-2175 | (217) 535-3100  
Animal Control & Adoption Center: 2100 Shale Street | Springfield, IL 62703-5634 | (217) 535-3065



**Rural Electric Convenience Cooperative**

PO Box 19 Auburn, IL 62615



217-438-6197 Your Touchstone Energy Cooperative 

August 26, 2025

RE: Will Serve Letter

Dear Prospective Data Center Tenants,

Rural Electric Convenience Cooperative Co. ("RECC") is the electric retail supplier for the proposed location of the Diamond Core Data Center ("Data Center"). RECC, along with its wholesale power supplier, NextEra Energy Marketing, LLC ("NEM") has agreed to serve the Diamond Core Data Center Phase 1 site in accordance with the Rules, Regulations and Bylaws of RECC; provided, such service is contingent on the agreement and execution of a tariff between the Data Center, RECC and NEM which will recover all costs and fees assessed to the load. The 336 MW of data center load has a proposed in-service date of December 1, 2028 with the load ramp is as follows:

2026 - 130MW

2027 - 260MW

2028 - 336MW

This load was previously approved by Ameren Transmission on its 345kV facilities on March 6, 2025 and was entered into the MISO MTEP25 cycle on May 28, 2025.

Sincerely,

A handwritten signature in cursive script that reads "Sean Middleton".

Sean Middleton, P.E. President/CEO  
Rural Electric Convenience Cooperative  
Sean.middleton@recc.coop



**APPLE CREEK WATER COOPERATIVE**  
1440 W. Walnut, Ste 1  
Jacksonville, IL 62650

January 29, 2026

C1 Sangamon 1 LLC  
Attn: Brad Houff  
2850 N. Harwood Street, Suite 2200  
Dallas, TX 75201

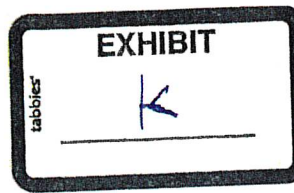
Dear Mr. Houff:

This letter will confirm that C1 Sangamon 1 LLC (C1 Sangamon) applied for water service from the Apple Creek Water Cooperative (Apple Creek) along Thayer Road in Talkington Township, Sangamon County, Illinois. Apple Creek Water Cooperative is a not-for-profit cooperative that operates a rural water distribution system in the area where C1 Sangamon plans to construct a data center.

Apple Creek is actively reviewing the application for water service that it received from C1 Sangamon and is actively discussing this application for water service with C1 Sangamon.

If you have any questions, please contact the Cooperative.

Dave Wohlers, President



January 29, 2026

Laura Cottrell  
CyrusOne Data Centers

**Ref: CyrusOne Sangamon  
AHJ Noise Study  
Trinity Project #252601.0044**

This memo evaluates noise levels from the proposed CyrusOne data center site in Sangamon, IL, with respect to local noise regulations. Our analysis considers projected sound levels from data center cooling equipment, back-up generators, and other auxiliary equipment.

### 1.0 Applicable Noise Codes

The project site is located in unincorporated Sangamon County, IL. As such, Noise Codes outlined by the Sangamon County Zoning Code and Illinois State Pollution Control Board will apply to the project.

#### Sangamon County Noise Code

Chapter 17.39 of the Sangamon County Zoning Code outlines noise requirements for Data Center developments below:

##### *17.39.020 – Special Requirements (F)*

*Noise levels measured at the property line shall not exceed fifty (50) decibels when located adjacent to an existing residence or residential district. Noise levels shall be enforced by both the State of Illinois and Sangamon County.*

We are assuming adjacent implies a shared property line between the source site and the receiver site. The project site is located adjacent to agriculturally zoned land with no residences built on them. As there are no adjacent residential districts or properties, the project is expected to be compliant with the Sangamon County Noise Code.

#### Illinois State Noise Code

The Illinois Pollution Control Board specifies allowable noise levels based on the land use classifications of both the noise source and the receiving property. This state-wide Code includes specific octave-band sound levels. However, at this stage of early design, we have focused on achieving overall dBA requirements. Detailed octave-band tuning will be addressed with the attenuation manufacturers as design progresses. We understand that the CyrusOne property will be classified as Class C.

##### *Title 35: Environmental Protection – Subtitle H: Noise – Ch. 1: Pollution Control Board*

*A person must not cause or allow the emission of sound from any property-line noise source located on any Class A, B, or C land to any receiving Class A land that exceeds any allowable octave band sound pressure level specified in the following table, when measured at any point within the receiving Class A land. Sound pressure levels must be measured at least 25 feet from the property-line noise source.*

Table 1: Maximum Sound Levels to Class A Land

Frequency (Hz)	Allowable Octave-Band Sound Pressure Level (dB)					
	C to A		B to A		A to A	
	Day	Night	Day	Night	Day	Night
31.5	75	69	72	63	72	63
63	74	67	71	61	71	61
125	69	62	65	55	65	55
250	64	54	57	47	57	47
500	58	47	51	40	51	40
1000	52	41	45	35	45	35
2000	47	36	39	30	39	30
4000	43	32	34	25	34	25
8000	40	32	32	25	32	25
<b>Overall dBA:</b>	<b>61</b>	<b>51</b>	<b>55</b>	<b>44</b>	<b>55</b>	<b>44</b>

"Daytime hours" means any continuous 16 hour period between 6:00 a.m. and 11:00 p.m. local time. "Nighttime hours" means the 8 hours between 10:00 p.m. and 7:00 a.m. that are not part of the 16 continuous daytime hours.

As the project is classified as Class C, an overall sound level of 61/51 dBA must be achieved during daytime/nighttime at Class A (residential) receivers, located further from the site. Remaining receivers surrounding the site are classified as Class C, which do not have noise limits under the Illinois State Code. There are currently no Class B receivers in the vicinity of the site.

The Illinois State Code additionally prohibits the emission of any prominent discrete tone from any property-line noise source located on Class A, B, or C land to any receiving Class A, B, or C land, when measured at any point within the receiving land, at least 25 feet from the property-line noise source. The impact of discrete tones will be studied as attenuation requirements are coordinated.

The Illinois State Code does not include an exemption for sound emissions during an emergency situation except for "emergency warning devices and unregulated safety relief valves." We assume sound produced from generators during a power-outage scenario is exempt from Noise Code requirements. Noise emissions from routine generator testing must comply with Code.

## 2.0 Data Center Parameters

At full build-out, the project site will consist of four data center buildings. Each building includes air-cooled chillers, RTUs, back-up generators, and UPS fans. Acoustic attenuation measures such as solid acoustic barriers, sound attenuators, and sound-rated generator enclosures are included to reduce operational noise levels and will be further coordinated as design progresses.

## 3.0 Results

The figure and table below summarize projected operational noise levels at various receiver locations, with land classifications overlaid for reference with the Illinois State Noise Code.

Daytime noise levels assume testing of two backup generators per building, in addition to all rooftop chillers and RTUs operating at full load. Nighttime modeling assumes only the chillers and RTUs at full load, as generator testing is anticipated to occur only during daytime hours.

Final noise levels may vary as coordination with equipment manufacturers continues; however, compliance with applicable Code limits will be maintained. Noise levels are modeled at 5 feet above the ground. Noise levels at existing nearby buildings with taller occupied floor elevations are expected to be quieter.

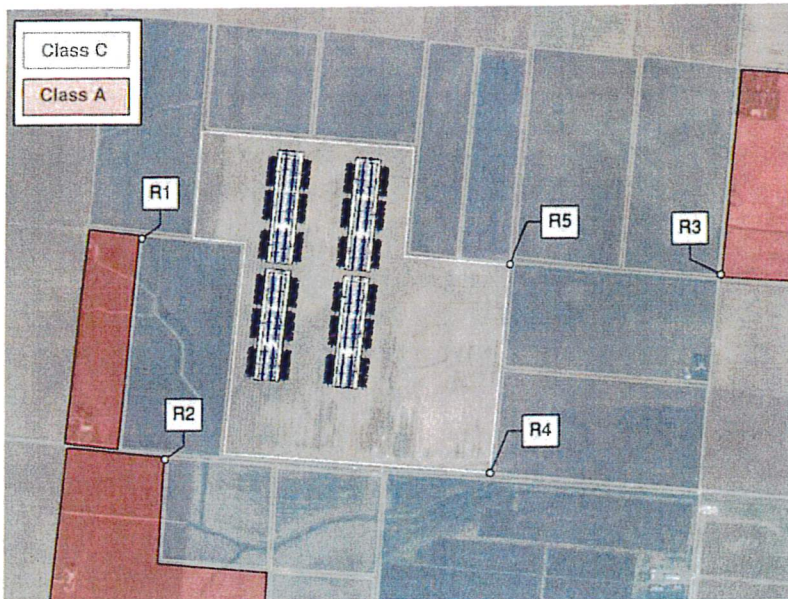


Figure 1: Site Layout and Receiver Locations

Table 2: Projected Data Center Noise Levels

Time Period	Data Center Noise Level at Receiver (dBA)				
	R1**	R2**	R3**	R4	R5
Daytime	53	54	41	46	50
Nighttime	42	40	32	38	32
Day / Night Code Limit*	61 / 51	61 / 51	61 / 51	-	-

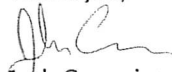
\*Octave-band code limits will be designed for compliance as design progresses.


\*\*C to A day/night limit conservatively applied to nearby properties containing residences used for Class C (agricultural) purposes.

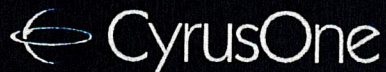
Based on our understanding of applicable Noise Codes, the project site is projected to be Code compliant at all surrounding receivers.

This concludes our comments at this time. Should you have any questions, comments, or concerns please do not hesitate to contact us.

Thank you,

  
Josh Cassarino  
Associate Principal

  
Lucas Schwartz  
Associate



November 18, 2025

Mr. Aaron W. Gurnsey  
President – Central Illinois Building and Trades Construction Council  
Business Manager – Financial Secretary/Treasurer  
Plumbers, Steamfitters & HVACR Techs Local 137  
2880 East Cook Street  
Springfield, IL 62703  
aarong@ua137.org

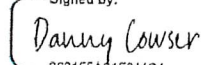
RE: Cyrus One Data Center Development – Sangamon County, IL

Dear Mr. Gurnsey,

CyrusOne is pleased to confirm its commitment to enter into a Project Labor Agreement (PLA) with the Central Illinois Building Trades and other relevant labor organizations for the proposed data center campus in Sangamon County, Illinois, pending approval by the Sangamon County Board. Our company values its longstanding partnership with labor and looks forward to continuing this collaboration on the project.

We are truly excited about the opportunity to bring this project to Sangamon County and to work alongside the Central Illinois Building Trades and other labor organizations. We look forward to building a lasting partnership and contributing positively to the local community.

Sincerely,

Signed by:  
  
863155A81F644C4...

Danny Cowser

Senior Vice President Construction

**Exhibit M**

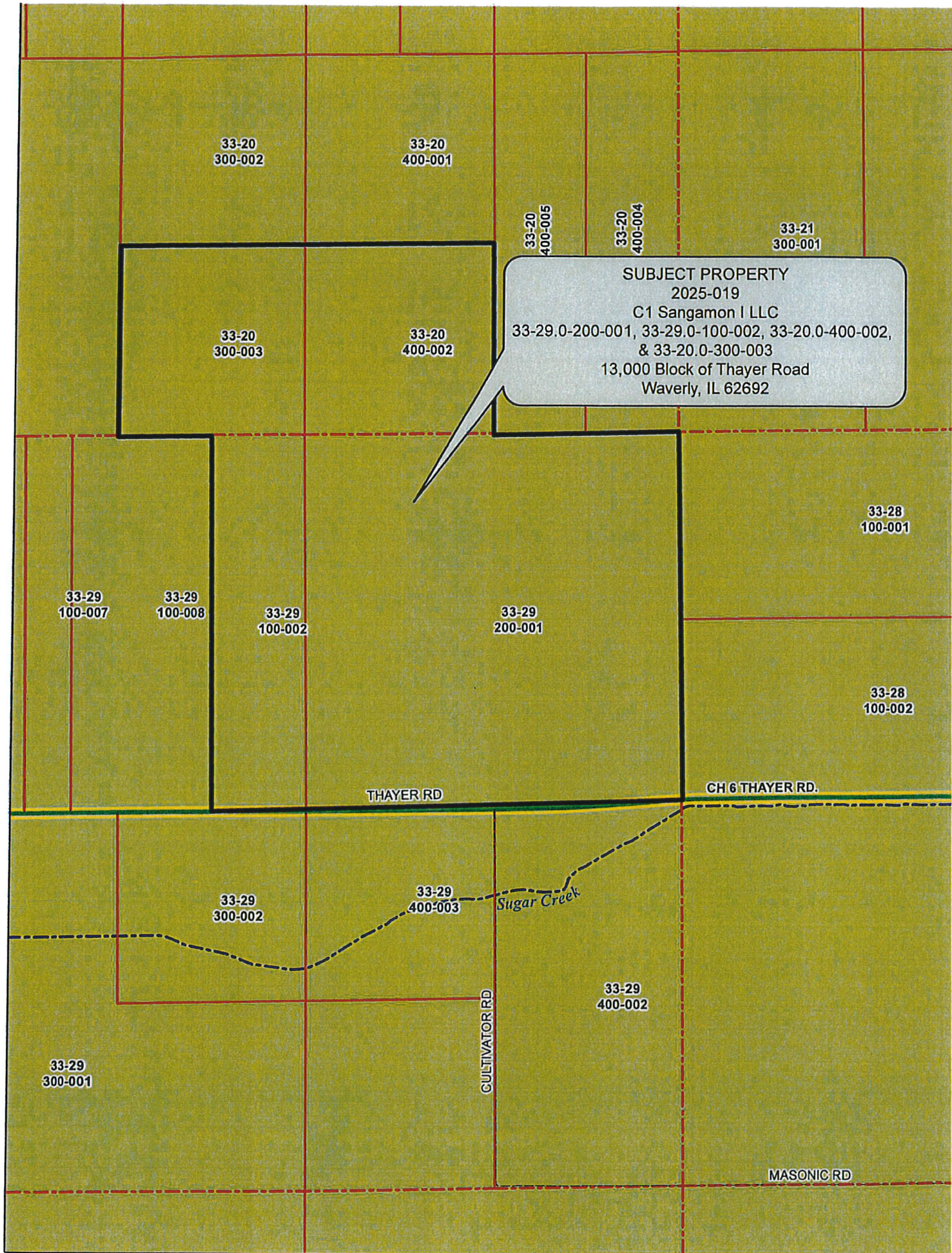
THE SOUTHWEST QUARTER OF THE SOUTHEAST QUARTER AND THE SOUTHEAST QUARTER OF THE SOUTHWEST QUARTER OF SECTION TWENTY (20), ALL IN TOWNSHIP THIRTEEN (13) NORTH, RANGE SEVEN (7) WEST OF THE THIRD PRINCIPAL MERIDIAN, SANGAMON COUNTY, ILLINOIS. SITUATED IN SANGAMON COUNTY, ILLINOIS.

TOGETHER WITH:

THE EAST HALF (E. 1/2) OF THE EAST HALF (E. 1/2) OF THE NORTHWEST QUARTER (NW 1/4) OF SECTION TWENTY-NINE (29), TOWNSHIP THIRTEEN (13) NORTH, RANGE SEVEN (7) WEST OF THE THIRD PRINCIPAL MERIDIAN, SANGAMON COUNTY, ILLINOIS. SITUATED IN SANGAMON COUNTY, ILLINOIS.

TOGETHER WITH:

THE NORTHEAST QUARTER (NE 1/4) OF SECTION TWENTY-NINE (29), ALL IN TOWNSHIP THIRTEEN (13) NORTH, RANGE SEVEN (7) WEST OF THE THIRD PRINCIPAL MERIDIAN, SANGAMON COUNTY, ILLINOIS. SITUATED IN SANGAMON COUNTY, ILLINOIS.



33-20  
300-002

33-20  
400-001

33-20  
400-005

33-20  
400-004

33-21  
300-001

33-20  
300-003

33-20  
400-002

**SUBJECT PROPERTY**  
2025-019  
C1 Sangamon I LLC  
33-29.0-200-001, 33-29.0-100-002, 33-20.0-400-002,  
& 33-20.0-300-003  
13,000 Block of Thayer Road  
Waverly, IL 62692

33-28  
100-001

33-29  
100-007

33-29  
100-008

33-29  
100-002

33-29  
200-001

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THAYER RD

CH 6 THAYER RD.

33-29  
300-002

33-29  
400-003

Sugar Creek

33-29  
400-002

CULTIVATOR RD

33-29  
300-001

MASONIC RD



2025

# Data Center Impact Analysis

RECEIVED

DATA CENTER

AN ASSESSMENT OF POTENTIAL ELECTRIC SYSTEM RELIABILITY AND COST IMPACTS OF

DEVELOPMENT IN SANGAMON COUNTY

FEB 25 2026

CHAMPAIGN CO. P & Z DEPARTMENT

THE POWER BUREAU, LLC

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# Executive Summary

The proposed development of a 600-megawatt data center in Sangamon County presents a major development opportunity for the region but has also raised concerns about whether hosting such a large energy user may erode the reliability of electric service and increase overall energy costs.

The County retained The Power Bureau to evaluate whether and to what extent the proposed data center increases reliability risks to the regional grid and consumers. In conducting its review, the Power Bureau considered the general scale and operation of the proposed data center, current wholesale regional energy market conditions, and then surveyed interested parties for their comments and concerns regarding the energy-related aspects of the data center project. These comments and concerns were then evaluated by the Power Bureau in the context of the policies, regulations and market functions that relate to energy reliability and costs in central Illinois.

The Power Bureau concludes that the proposed data center will not cause reductions in the reliability of the local utility network or the regional grid. Three key elements support these conclusions:

- The data center project's local service interconnection will be separate from the existing local utility network that serves current customers;
- The local utility's experience with the technical requirements related to delivering electricity from the regional grid to local consumers; and,
- The approval by the regional grid operator to allow the proposed data center to connect to the regional grid.

In addition, the proposed data center is unlikely to cause cost increases for either the local utility's current customers or consumers that are served by neighboring utility providers. Three key elements support these conclusions:

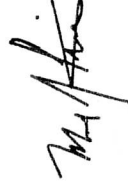
- The data center developer is to pay for the costs of establishing an interconnection to the regional grid by extending the local utility network;

- The data center developer is to pay a delivery rate based on the volume of electricity delivered by the local utility that is sufficient to cover the costs of maintaining and operating the infrastructure required to serve the proposed data center;
- The data center is to pay the full cost of electricity supply that is secured by the local utility through its existing power marketer under a contract that is separate and apart from the existing supply agreements that secure supply and pricing for the local utility's current customers; and,
- The regional averaging of wholesale capacity and energy markets will continue to insulate all consumers located in Central Illinois from electricity price volatility and increases after the proposed data center enters operation.

Based on these, the Power Bureau concludes that hosting the proposed data center in Sangamon County will have minimal – if any – impact on network system reliability or energy costs.

The Power Bureau appreciates the opportunity to participate in this process and remains available to provide additional context and background on this analysis and conclusions.

Best regards,



Mark Pruitt  
Principal  
The Power Bureau, LLC

# Approach

This report evaluates the potential impacts on electric service reliability and costs related to the proposed development of a 600-megawatt (MW) data center in Talkington Township of Sangamon County, Illinois (the "Project"). The Power Bureau was retained to perform the evaluation and submit its findings to the County Board. The Power Bureau is an energy planning and procurement consulting firm with long-term experience in wholesale and retail energy issues in Illinois. The CV of the staff that performed this evaluation can be found in Attachment A.

The Power Bureau's activity followed the process outlined below:

1. Research baseline energy cost and reliability metrics for the Central Illinois region.
2. Interview relevant parties for specific background, observations, and concerns regarding the Project.
3. Review issues identified in the interviews in the context of energy operations in Central Illinois.
4. Evaluate concerns regarding electric service reliability raised by the parties.
5. Issue this report and be available to respond to further questions from the County Board, County Staff, and the public.

The Power Bureau engaged in interviews with representatives from the following parties:

1. CyrusOne (data center developer)
2. Swift Current Energy (solar farm operator)
3. Rural Electric Convenience Cooperative (local electric utility)
4. Springfield Sangamon Growth Alliance (development agency)
5. Coalition for Springfield's Energy Future (citizen group)
6. Sierra Club of Sangamon Valley (environmental group)

The Power Bureau also referenced publicly available information and data related to the regional grid that serves Central Illinois including:

1. Ameren Illinois (transmission asset owner)
2. Midcontinent Independent System Operator (regional grid operator)
3. Federal Energy Regulatory Commission (federal energy regulator)
4. Proprietary maps and software containing information concerning transmission and generating assets operating in Central Illinois.

Based on the above inputs, the Power Bureau identified the following key questions to serve as the structure for this project:

## **1. Questions Concerning Reliability:**

- A. Can the local utility network manage the increased load represented by the Project?
- B. Which power plants will provide the electricity for the Project?
- C. Will residents be prioritized for service by the local utility in the event of a blackout?
- D. Will the regional transmission grid be overstrained by adding the Project?
- E. Is there enough generating capacity in the region to serve the Project?

## **2. Questions Concerning Cost:**

- A. Who will pay for the pay for upgrades to the local utility network necessary to serve the Project?
- B. Will delivery rates for existing RECC customers increase due to the Project?
- C. Will energy supply rates for existing RECC customers increase due to Project?
- D. Will increased demand for electricity by the Project increase wholesale electricity supply and capacity costs in Central Illinois?

## Context

The issues examined in this report relate to the regulatory structures that govern wholesale power markets and their operations. This section provides an overview of these structures to provide context for the later discussions concerning specific questions raised about the potential impacts on service reliability and costs resulting from the Project.

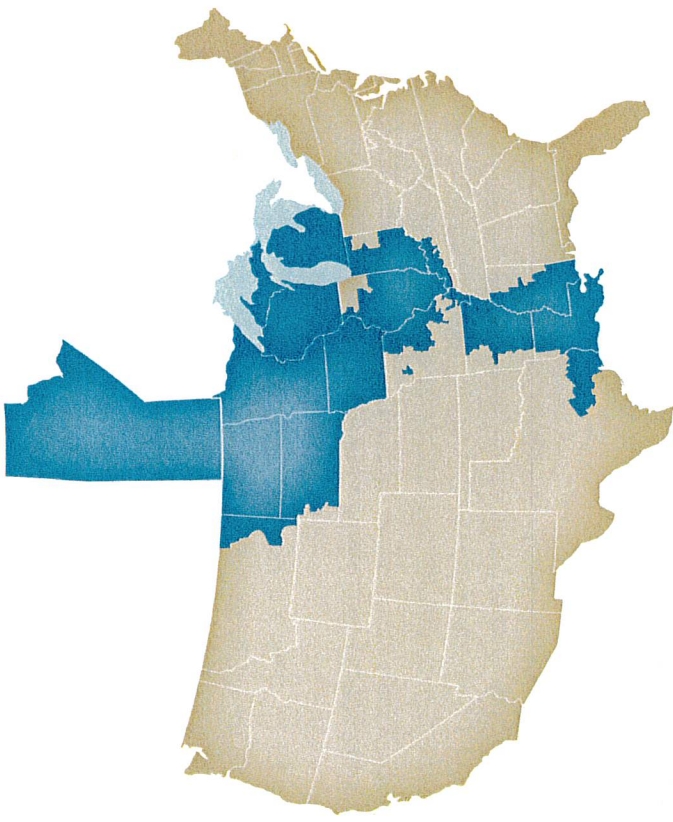
**Wholesale Power Markets.** The Federal Energy Regulatory Commission (FERC) regulates the transmission and sale of electricity under the authority granted by the Federal Power Act (FPA). The reliability of the bulk-power system is the highest priority under the FPA, and all rates and charges for wholesale power must be just reasonable and not unduly preferential or discriminatory.

FERC approves reliability standards for the nation's bulk-power system (i.e., the interconnected transmission grids) as developed and enforced by North American Electric Reliability Corporation (NERC). NERC reliability standards must be met by industry participants (i.e., local utilities) which operate within NERC regions. Central Illinois is included in NERC region named the Midwest Reliability Organization.

FERC requires that wholesale power costs to be set through either cost-based or market-based methods. Market-based pricing is typically used by regions served by an Independent Market Operators (ISO) or a Regional Transmission Organization (RTO). The ISOs and RTOs use auctions to establish least-cost power supply. The Midcontinent Independent System Operator (MISO) serves Central Illinois. Functionally, MISO's operations prioritize the reliability requirements set by NERC and MRO. The regions served by MISO are indicated in blue in Figure 1.

▪ **Reliability Functions.** Power system frequency – measured in Hertz (Hz) – is an indicator of the instantaneous balance between power supply and demand. In the US, a stable frequency of 60 Hz must be maintained to prevent damage to primary grid components which could lead to system collapse. Functionally, reliability for Central Illinois is managed by MISO. To

Figure 1: Midcontinent Independent System Operator (MISO)



meet its grid reliability mandates, MISO performs a range of operational functions including:

- **Resource Assessments.** MISO surveys all publicly available planning documents and reports concerning generation resource deployments, projected load growth, and energy-related policies from the electric utilities operating within the service region to develop insights into the expected resource changes and needs in the longer term ([2024 Regional Resource Assessment](#)).
- **Interconnection Management.** MISO must approve all proposed generation assets and large loads before they deliver or withdraw power from the regional grid. The interconnection approval process is designed to ensure that output from proposed generation resources (i.e., solar farms, battery storage, natural gas power plants) will not overwhelm

transmission system components or consumer demand. The interconnection process also ensures that increased demand from proposed new consumers (i.e., factories, data centers, residential housing developments) will not exceed the maximum delivery capabilities of existing generation and transmission systems.

- **Annual Planning Resource Auctions (PRA).** MISO manages annual PRA auctions each Spring to determine whether there is sufficient generating capacity to meet peak electricity demand within MISO. All generating assets connected to the transmission network managed by MISO must participate in the PRA and be able to deliver contracted capacity for the following June through May yearly period ([2024 PRA Results for Planning Year 2024-25](#)). Load serving entities (i.e., utilities, retail energy suppliers) must secure a level of capacity equal to or greater than the projected peak demand of their customers through a combination of: i) purchasing capacity from the PRA auction; ii) securing capacity bilaterally from another party; or iii) showing evidence of self-provided capacity with controlled assets.
- **Supply Scheduling.** MISO continuously matches supply with demand by controlling which generating resources deliver electricity to the regional transmission network. MISO utilizes auction processes to select which generating resources operate on a Day-Ahead and Real Time basis.
- **MISO Transmission Expansion Planning (MTEP).** MISO plans transmission system expansions and extensions under authority granted by the FERC-approved Open Access Transmission Tariff (OATT). Under MTEP, MISO plans, evaluates, and authorizes cost-effective transmission system improvements that increase regional grid reliability ([MTEP Reports](#)).
- **Cost Functions.** MISO utilizes market-based auctions to set prices for electricity capacity, supply and ancillary services and cost-based tariffs to recover costs associated with interconnection to and use of transmission assets.
- **Interconnection Costs (Transmission Access).** New generation resources and large loads may connect to the MISO transmission network only

when: i) their addition will not cause a loss of reliability; or ii) the owners of the proposed new generation resources or large loads pay for transmission system upgrades that would ensure the reliability of the grid after the connection of the new generation resources or large loads. These costs include, but are not limited to planning, engineering, procurement, and construction of transmission line extensions, reconductoring, substations, transformers, breakers, and all other elements required to ensure reliable operation of the transmission network after the introduction of the new generation resource or large load.

- **Annual Planning Resource Auctions (Capacity).** MISO's PRA auctions yield prices for capacity that must be purchased by load serving entities that have not already secured capacity from another resource or provide capacity with owned generation resources..
  - **Day-Ahead and Real Time Energy Auctions (Electricity Supply).** MISO conducts Day-Ahead and Real Time auctions to set hourly and sub-hourly prices for electricity supply at local nodes as well as aggregated hubs.
  - **Co-Optimized Service Market (Ancillary Services).** When the supply of ancillary services is greater than demand, the price for ancillaries is set at the marginal offer from generators (a market-based process). When supply of ancillaries is less than demand, the price is set by using the Operating Reserve Demand Curve (a tariff-based instrument).
  - **Transmission Tariff.** The cost of utilizing transmission assets in MISO are based on a formula that factors investment costs to build the assets, authorized rate of return (which is set by FERC), and asset utilization.
- Retail Service.** The reliability standards and costs related to delivering electricity from the regional grid to the consumer through local service networks operated by load-serving entities (i.e., an investor-owned utility, a municipal utility, an electric cooperative, a retail energy supplier) are regulated through a combination of federal and state mandates. The safety and reliability of the local service network is the highest priority for load serving entities, and

all rates and charges for retail service must be just, reasonable, non-discriminatory, and filed with FERC.

▪ **Reliability Functions.** The reliability of local service networks is driven by the ability to construct and maintain multiple (and ideally redundant) connections to the regional power grid, step-down voltages to suitable levels, and then provide a secure and continuous flow of electricity to customer meters. Each stage of this delivery chain requires capital investment as well as running costs for planning, management, and operations. The reliability standards for retail services are typically identified in planning documents, filings with regulatory bodies (i.e., MISO, utility commissions) and the load serving entity's tariff.

- **Local Resource Adequacy Planning.** Load serving entities engage in either their own resource planning (e.g., an Integrated Resource Plan) or as part of regional planning through their respective RTO or ISO. These plans identify any resource gaps between projected consumer demand and available generation resources in future periods, examine options for bridging any resource gaps, and lay out a plan of action for the organization to secure additional capacity on a least-cost basis. In Illinois, electric cooperatives and municipal utilities undertake ongoing resource planning while investor-owned utilities have not actively engaged in comprehensive resource planning for over 20 years and have instead deferred to ISOs and RTOs for those functions.

- **Interconnection Management.** All proposed distributed generation assets (i.e., rooftop solar, on-site batteries, etc.) and large loads must receive permission from the local load-serving entity to connect to the local service network. Interconnection approval processes are designed to ensure that distributed generation resources will not cause operational complications or safety issues. Additionally, the interconnection process ensures that increased demand from proposed new loads can be accommodated by the existing physical resources of the local electric network. Typically, the introduction of large new loads will also cause local load-serving entities to review their resource adequacy plans.

▪ **Cost.** The costs of retail electric service by the local load-serving entity may be market-based, cost-based, or a combination of the two as determined by the load-serving entity.

- **Retail Supply Procurement.** For electric cooperatives and municipal utilities in Illinois, the cost of electricity supply for retail customers (e.g., the sum of wholesale capacity, energy, transmission and ancillaries) is set by a portfolio of long- and short-term purchases or from the operation of generation resources that are controlled by the cooperative or municipal utility. Electric cooperatives and municipal utilities in Illinois may purchase wholesale capacity, energy, transmission, and ancillaries directly from the wholesale markets operated by MISO or use third parties such as Power Marketers to perform those functions. Typically, cooperatives and municipal utilities secure long-term supply agreements to ensure resource adequacy and price stability.

Consumers served by investor-owned utilities in Illinois have the right to secure retail supply through retail electricity suppliers and have that electricity delivered through the local service network. Large consumers served by investor-owned utilities that choose not to select a retail energy supplier receive retail supply at the prevailing variable wholesale rate for capacity, energy, transmission, and ancillaries as set through the ISO/RTO. Small consumers served by investor-owned utilities that choose not to select a retail energy supplier receive retail supply at a rate established through procurement processes managed by the Illinois Power Agency. Typically, prices for retail supply for consumers served by investor-owned utilities in Illinois extend for periods as of between a few months and two to three years.

- **Interconnection Fees.** New distributed generation resources or large loads may connect to local service networks only after authorization by the load-serving entity. Typically, the load-serving entity will require that the proposed distributed generation be configured in a manner to ensure the safety and reliability of the local service network. The costs of meeting these configuration requirements are typically paid by the owner of the proposed distributed generation. Owners of new retail loads (of any size) are typically responsible for paying the costs of extending or improving the local service network to connect the new retail load.

- **Operating Costs.** Customers pay for electricity supply services through rates charged by the local load-serving entity. Consistent with FERC mandates requiring non-discriminatory pricing, most load-serving entities undertake Cost-of-Service-Studies (COSS) to establish the cost to provide electric service to distinct types of customers (i.e., residential, commercial, industrial) and to then develop tariffs that apply those costs to the appropriate customers. In so doing, the load-serving entity prevents situations where certain consumers are subsidizing the services provided to other consumers.

Figure 2: Primary Parties Responsible for Electricity Service in Central Illinois

PARTY	RELIABILITY ACTIONS	COST ACTIONS
Federal Energy Regulatory Commission (FERC)	<ul style="list-style-type: none"> <li>▪ Requires compliance with reliability standards and practices (established and enforced by NERC under FERC authority)</li> <li>▪ Requires that all generators and load-serving entities be allowed non-discriminatory access to transmission networks</li> </ul>	<ul style="list-style-type: none"> <li>▪ Allows costs to be market-based or cost-based</li> <li>▪ Requires that all tariffs be non-discriminatory</li> </ul>
Independent System Operator (ex. MISO)	<ul style="list-style-type: none"> <li>▪ Schedule Supply to match Demand (continuously)</li> <li>▪ Evaluate and approve interconnection of Generation and Large Loads to the regional grid while maintaining reliability</li> <li>▪ Plan and approve transmission system expansions</li> </ul>	<ul style="list-style-type: none"> <li>▪ Operate competitive auctions (Capacity, Day-Ahead and Real-Time) to select least-cost Supply to match Demand.</li> <li>▪ Approve cost-effective transmission projects</li> <li>▪ Establish cost-based tariffs for transmission</li> </ul>
Generator (ex. Dynegy)	<ul style="list-style-type: none"> <li>▪ Own and reliably operate Generation</li> <li>▪ Respond to MISO operational requests/requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ Bid Generation outputs (Capacity, Electricity, Ancillary Services) into MISO-approved auctions and processes</li> </ul>
Transmission (ex. Ameren Illinois)	<ul style="list-style-type: none"> <li>▪ Own and reliably operate Transmission Assets (&gt;69 kV)</li> <li>▪ Respond to MISO operational requests/requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ Fund the operation and maintenance of transmission assets with approved funding and in accord with MISO requirements</li> </ul>
Marketers (ex. NextEra)	<ul style="list-style-type: none"> <li>▪ Secure Capacity from Generators for Load Serving Entities</li> <li>▪ Schedule Energy deliveries from the regional grid</li> <li>▪ Respond to MISO operational requests/requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ Hedge against market volatility (financial, physical)</li> <li>▪ Secure least-cost Supply components (Capacity, Energy)</li> </ul>
Load Serving Entity (ex. RECC)	<ul style="list-style-type: none"> <li>▪ Build and operate reliable local distribution networks that connect the regional grid to individual consumers</li> <li>▪ Make / Buy electricity Supply to meet consumer demand</li> <li>▪ Respond to MISO operational requests/requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ Obligation to allocate the costs of building and operating the local distribution network to the cost causers via Cost-of-Service Studies (COSS)</li> <li>▪ Secure stable / least-cost Capacity and Energy for consumers</li> </ul>

## Issues and Evaluation

The representative questions identified in the 'Approach' section above were selected to serve as a framework for the following discussion concerning the potential impacts of the Project. Responses to the representative questions are intended to be as complete and thorough as possible. As such, certain graphics and other information are provided for illustrative purposes.

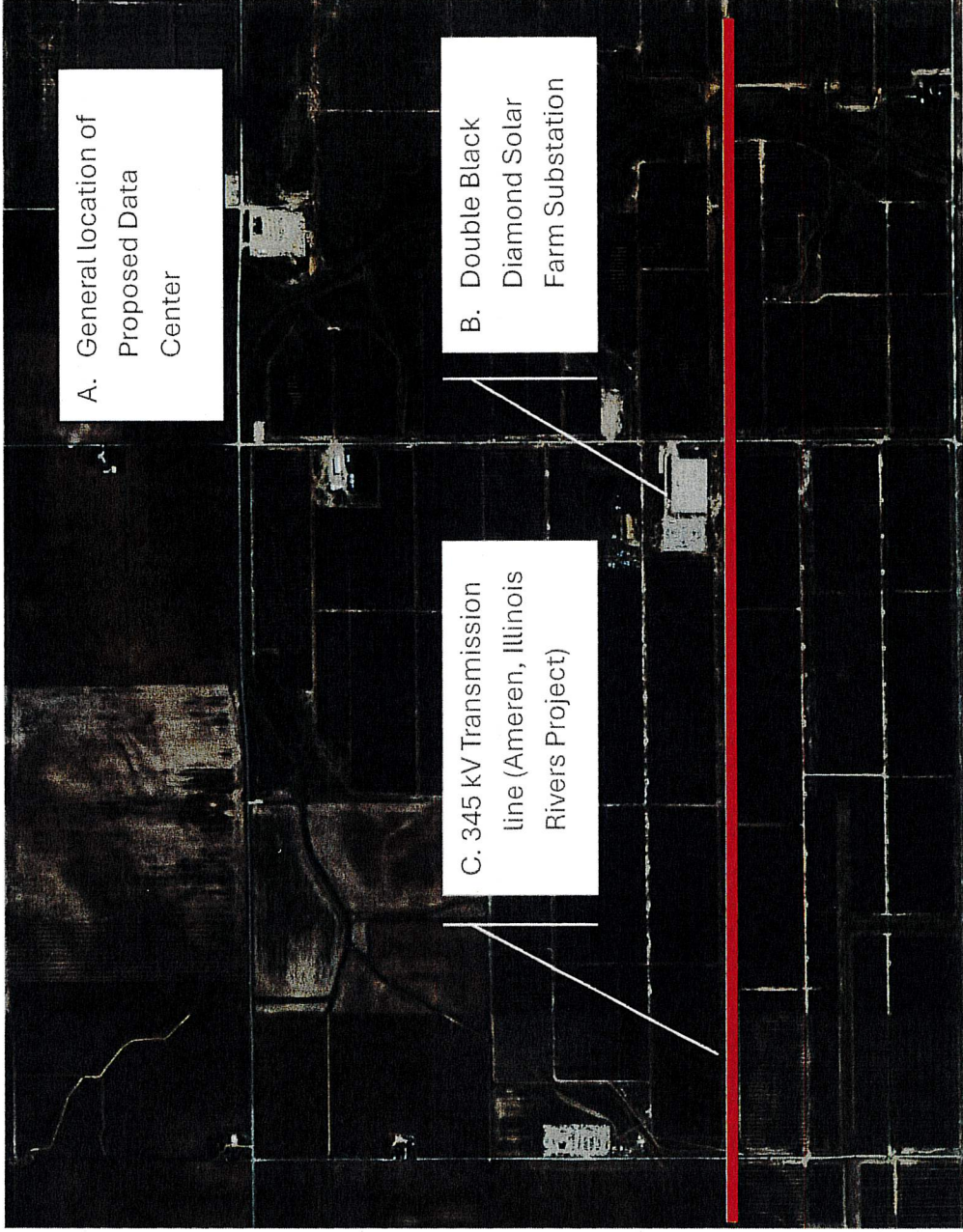
**Questions Concerning Reliability.** The reliability of electric service for existing consumers of RECC as well as the broader Central Illinois region was a primary issue raised by some of the parties interviewed. The following questions seek to address whether and to what extent the Project may impact local and regional system reliability.

- Can the local service network manage the increased load represented by the Project?

Yes.

Electric service for the Project (location A, Figure 3) will be provided via a new substation that currently connects the Double Black Diamond solar farm (location B, Figure 3) to an existing 345-kV transmission line (location C, Figure 3). As such, electric service to the proposed Project will not travel over any local service network assets that currently serve existing RECC customers. This isolation from the broader RECC network will simplify service delivery to the Project while

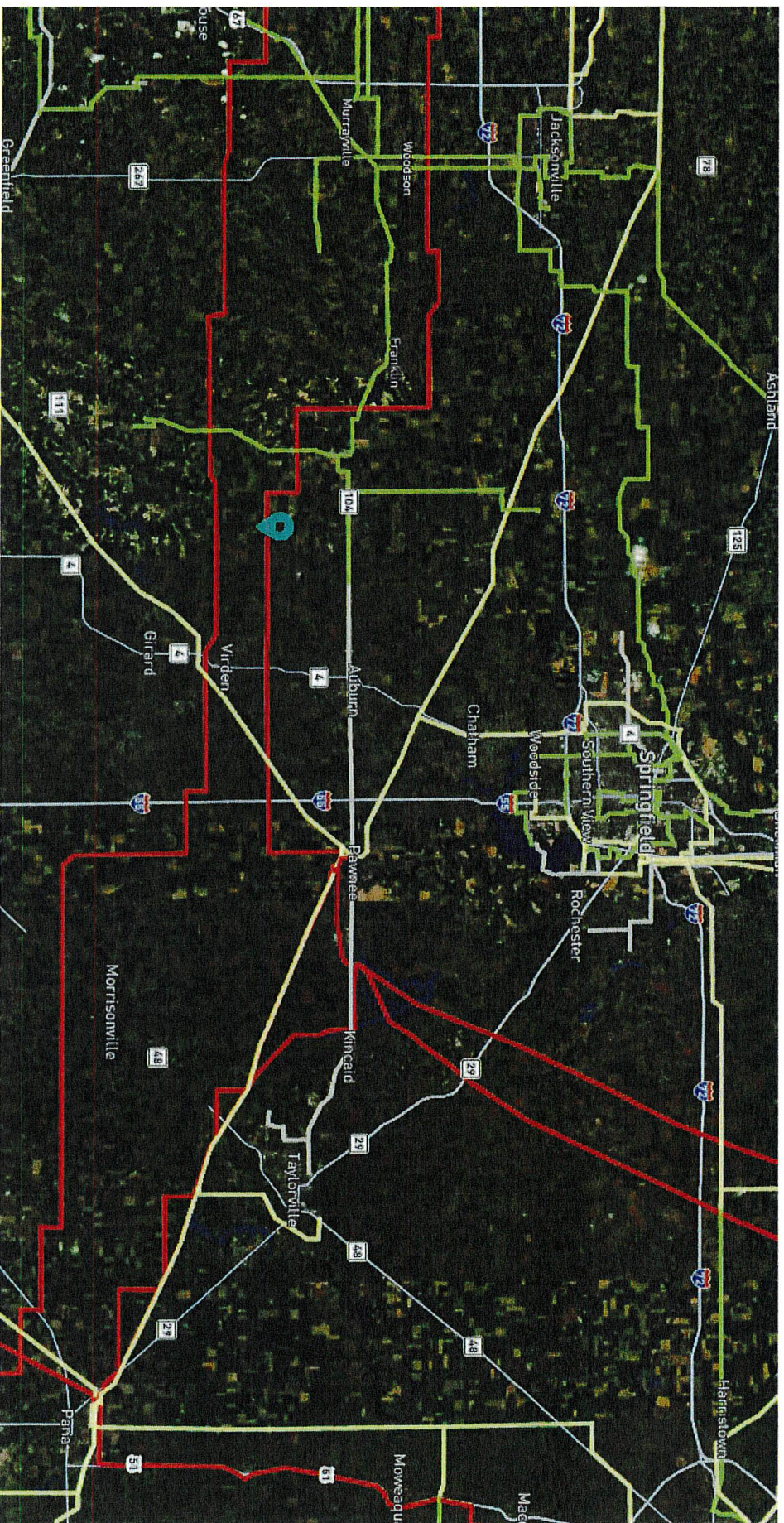
Figure 3: Location of Existing Electric Transmission Infrastructure in Talkington Township



preventing potential complications associated with integrating the Project's large load with the loads of existing customers.

Further, the 345-kV transmission line which will serve as the primary delivery route for electricity to the Project is itself a separate portion of the

Figure 4: Separation of 345-kV Transmission serving the proposed data center site from lower voltage transmission that currently serves RECC



transmission system from the points at which RECC's local service network connects to the larger MISO grid. As shown in Figure 4, the 345 kV transmission line that will serve the Project (blue pin) runs from Meredosia (west) and Pawnee (east). According to RECC, the cooperative's local service networks connect to lower voltage transmission assets in the region including 69 kV (green transmission lines in Figure 4) and 138 kV (yellow

transmission lines in Figure 4) which are isolated from the 345 kV transmission line (red transmission line adjacent to blue pin in Figure 4) that will serve the proposed Project. Based on the physical characteristics of the local service network and the regional transmission grid, extending service to the Project will not impact existing RECC customers.

- Which power plants will provide the electricity for the Project?

Unknown.

RECC intends to secure and schedule wholesale power and electricity for the Project with its Power Marketer (NextEra) under an agreement that is separate from the current supply agreement which secures fixed price power and supply for RECC's existing customers through 2033.

If the contract with NextEra is consistent with prevailing practices, then the power supply for the Project would be sourced from whatever power plants are selected to operate through MISO's Day-Ahead and Real-Time auction processes. Figure 5 conveys the hourly mix of generation within MISO between 11/1/2025 and 12/1/2025. As noted, the generation during each hour can vary widely.

Additionally, MISO can import power from neighboring wholesale regions to meet its internal supply needs. Figure 6 tracks the electricity imports

Figure 5: Sources of Energy Vary Hourly in MISO

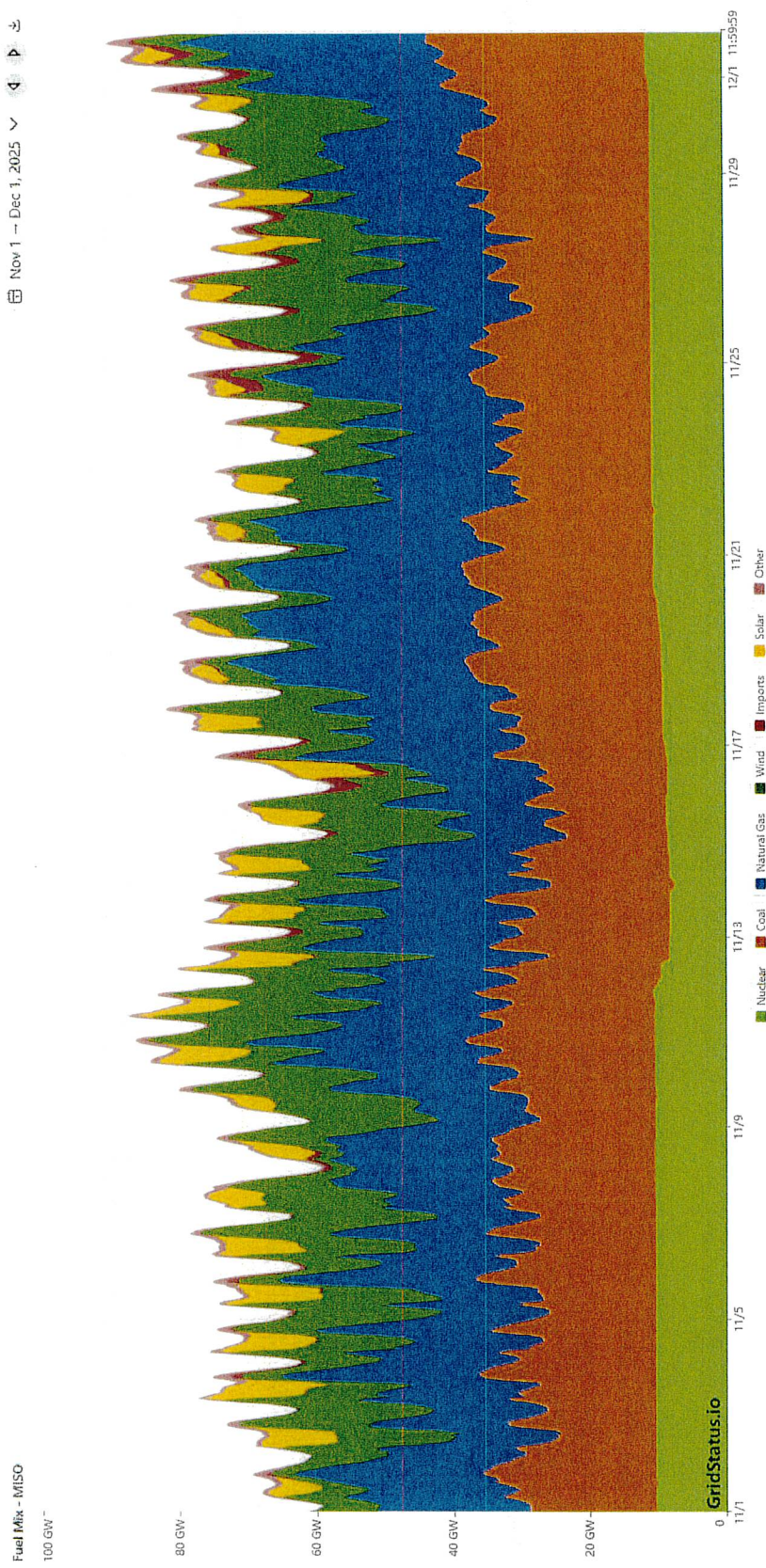
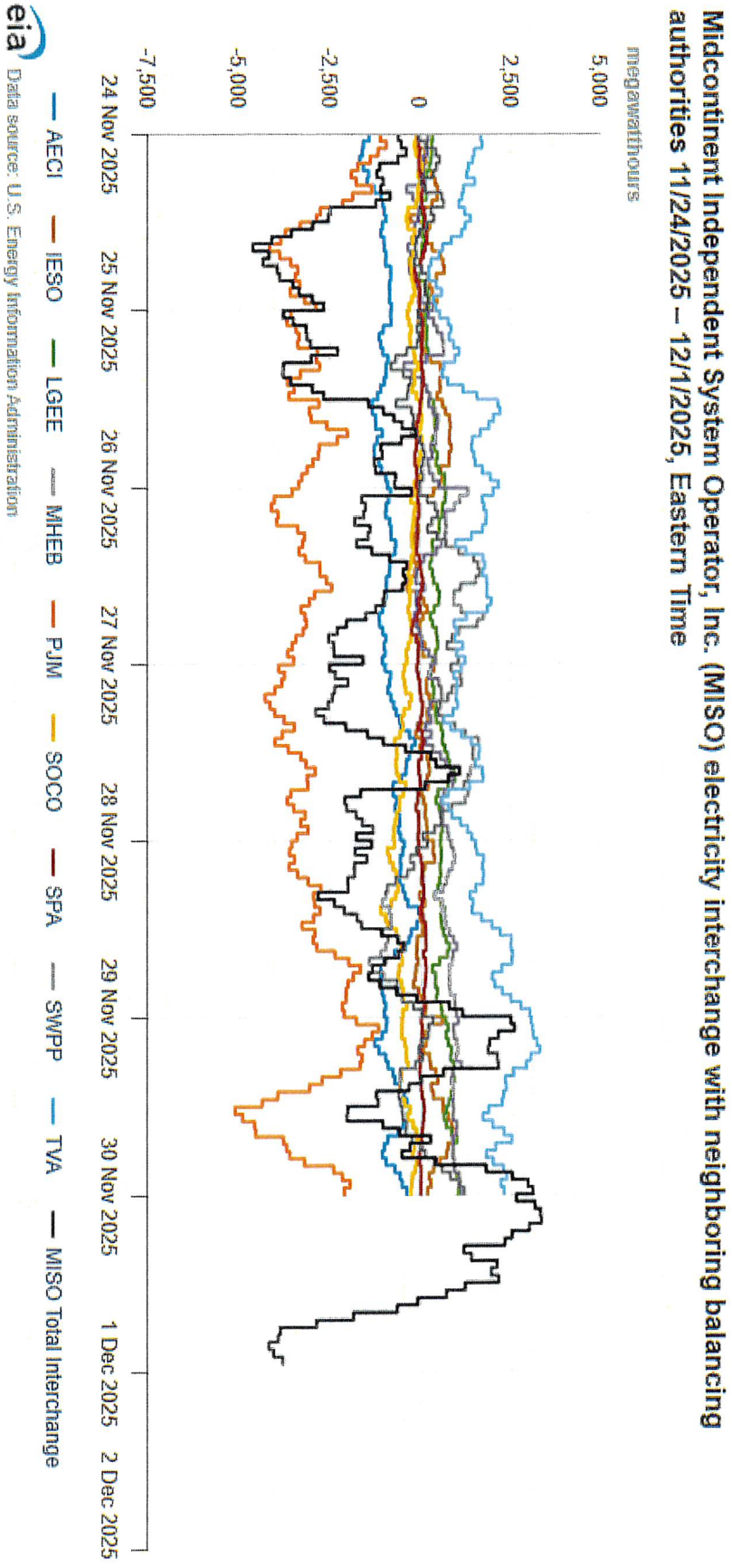


Figure 6: MISO Continuously Imports and Exports Electricity to Neighboring Regions



(negative values) and exports (positive values) between MISO and neighboring balancing authorities between 11/24/2025 and 12/1/2025.

- Will residents be prioritized for service by the local utility in the event of a blackout?  
Not applicable.

As noted above, the Project will not share any portion of the RECC local service network; therefore, outages for existing RECC customers are unlikely

to coincide with an outage impacting the Project. Additionally, industry practice dictates that Project maintain redundant backup power resources to ensure continued operation in the event of an outage. Because of this, even if an outage were to impact RECC's entire local service network, the Project could continue operating using backup power generators while RECC worked to restore service to other RECC customers.

- Will the regional transmission grid be overstrained by the Project?  
No.

MISO has approved the interconnection of the Project based on its evaluation of the stability of the regional grid with the inclusion of the additional load. Additionally, the substation and 345 kV transmission line that will serve the proposed Project are both newer resources and operating well-within their rated capacities.

▪ **Is there enough generating capacity in the region to serve the Project?**

Yes.

MISO's approval for the interconnection of the proposed Project load was also based on its evaluation of the availability of generating capacity to meet all existing regional peak demand as well as the additional load represented by the proposed Project. Moving forward, MISO will continue to improve and expand its transmission network to allow more capacity to flow through the region, and starting in 2026 the Illinois Commerce Commission will commence integrated resource planning to further evaluate the level of available capacity, specifically in Illinois.

**Questions Concerning Cost.** The overall cost of electric service for existing RECC customers and all consumers in Central Illinois was also raised by parties. The following questions seek to address several aspects of electricity costs for consumers considering the Project.

▪ **Who will pay for the pay the interconnection costs for the Project?**

The data center developer.

Consistent with industry practice, the data center developer will be responsible for paying the full cost for extending the local network to the Project and interconnecting with the regional grid.

▪ **Will delivery rates for existing utility customers of the local utility increase?**

No.

RECC and the data center developer will enter into a special agreement under which the data center will pay a rate designed to cover the ongoing costs of maintaining and operating the local network extension to the proposed Project. Under this structure, the costs of service for the proposed

Project (i.e., interconnection, maintenance, and operation) will also be segregated from RECC's existing customers.

▪ **Will supply rates for existing RECC customers increase due to the Project?**

No.

RECC will structure a power supply agreement with NextEra for the power and electricity needs of the Project that will be separated from the power supply agreements that set electricity supply prices for RECC's existing customers. Costs associated with this separate agreement with NextEra will be passed through to the data center developer. Under this structure, the energy supply costs for the Project will be segregated from RECC's existing customers.

▪ **Will increased demand for electricity due to the Project increase regional electricity costs in Central Illinois?**

Not likely.

Energy supply prices in MISO are set through Day-Ahead and Real Time auctions which rise and fall according to the relative balance of supply and demand. This can lead to price volatility and a wide range of prices throughout MISO. Figure 7 conveys this pattern.

Some have noted that increasing demand at a specific point in the ISO regional grid could cause prices in and around that immediate area to increase (a "node"). While this is technically true, the reality is that most consumers do not pay the localized clearing price for electricity supply. Instead, industry practice is for most pricing for electricity supply to settle at regional hubs. Hub pricing refers to energy prices for a specific region, such as the Illinois Hub, and are calculated based on the actual clearing prices at the multiple nodes within that region. T

Hub prices are calculated by averaging node prices and thereby provide a single price for that area rather than requiring a unique price for every single node on the grid. MISO uses different averaging methods for peak and off-peak hours, as well as for day-ahead and real-time markets.

Because consumers in Central Illinois are exposed to Illinois Hub pricing, the localized impact of adding 600 MW of new hourly energy consumption in Sangamon County will be muted when averaged with all other nodes located throughout central and southern Illinois. Further, because most consumers (or their load serving entities) opt to hedge their energy prices into the future instead of paying the market-based hourly rate there are actually very few consumers in central and southern Illinois who would be directly exposed to immediate increases in Illinois Hub prices after the proposed Project begins operations.

A similar dynamic occurs with capacity prices within MISO where capacity shortfalls in one region do not immediately result in localized higher prices. Because the MISO regional grid allows for the movement of capacity between regions it is more likely that capacity prices will revert to an average across multiple regions. Figure 8 displays the most recent capacity auction results for MISO where this pattern can be observed.

Figure 7: Price Variations between Nodes and MISO Regional Hubs

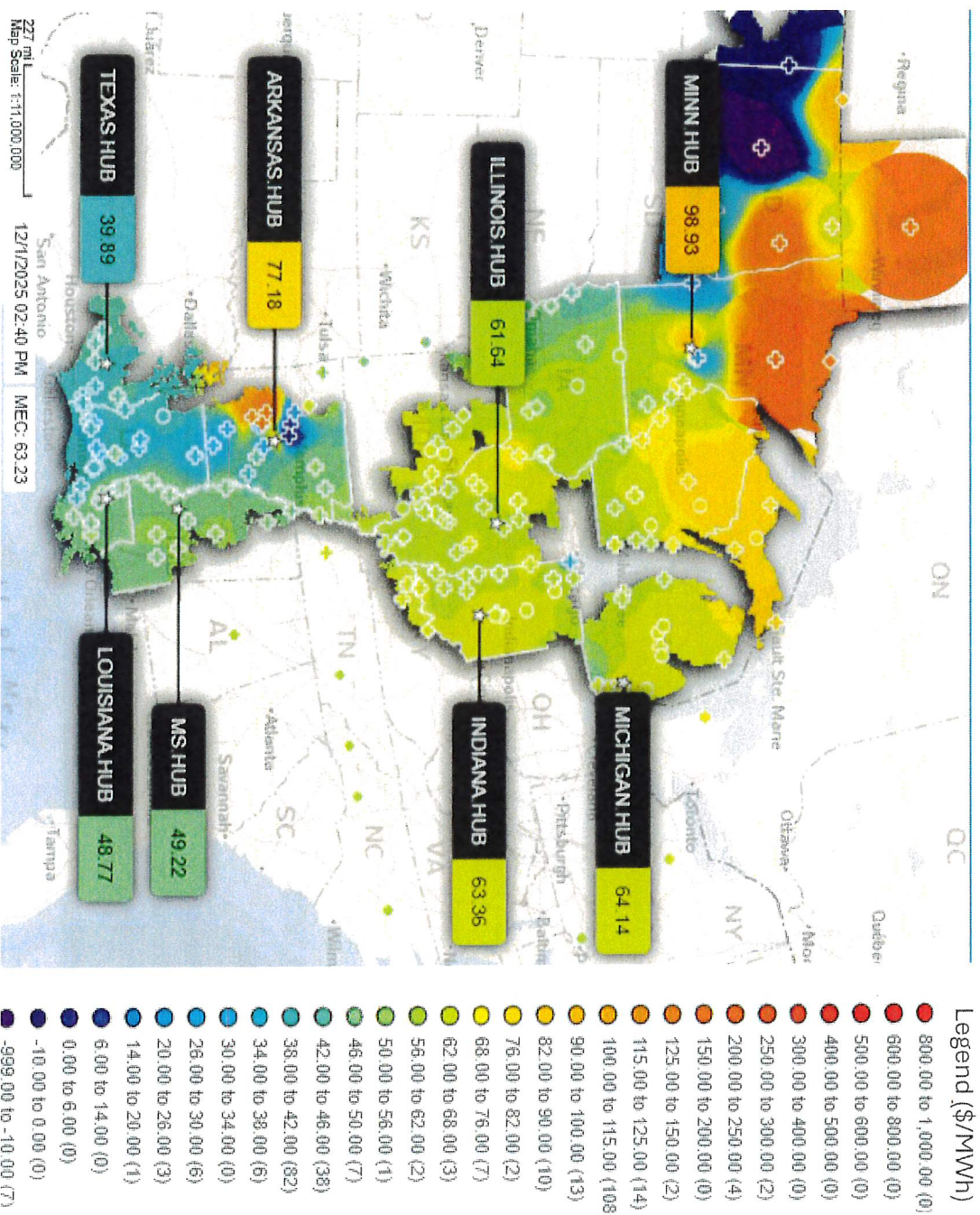


Figure 8: MISO Capacity Auction Results Demonstrate Averaging of Regional Costs Regardless of Local Supply/Demand Balances

## Summer 2025 PRA Results by Zone

	Z1	Z2	Z3	Z4	Z5	Z6	Z7	Z8	Z9	Z10	ERZ	North	South	System
Initial PRMR	18,459.4	13,190.2	10,889.2	9,237.6	8,281.3	18,484.8	21,228.0	8,487.8	21,812.2	5,142.9	N/A	99,770.5	35,442.9	135,213.4
Final PRMR	18,843.5	13,464.4	11,116.0	9,430.10	8,453.5	18,868.9	21,669.2	8,552.6	21,978.8	5,182.3	N/A	101,845.6	35,713.7	137,559.3
Offer Submitted (Including FRAP)	19,732.4	14,569.7	11,321.4	9,328.1	6,737.9	16,123.6	20,883.9	11,517.3	20,498.6	5,543.3	1580.1	99,952.6	37,883.7	137,836.3
FRAP	4,619.2	10,252.6	456.9	789.4	0.0	1,080.7	541.3	494.9	157.5	1,507.7	46.8	17,779.2	2,167.8	19,947.0
RBDC Opt-Out	-	-	-	-	-	-	-	-	-	-	-	0.0	0.0	0.0
Self Scheduled (SS)	4,985.3	3,344.1	10,450.2	7,677.2	6,647.8	11,080.3	20,305.5	10,260.6	17,870.6	3,831.3	1,358.8	65,567.6	32,244.1	97,811.7
Non-SS Offer Cleared	10,127.9	973.0	414.3	861.5	90.1	3,962.6	37.1	761.8	2,193.5	204.3	174.5	16,605.8	3,194.8	19,800.6
Committed (Offer Cleared + FRAP)	19,732.4	14,569.7	11,321.4	9,328.1	6,737.9	16,123.6	20,883.9	11,517.3	20,221.6	5,543.3	1,580.1	99,952.6	37,606.7	137,559.3
LCR	15,696.9	9,719.3	8,049.3	2,577.8	6,071.1	13,051.7	19,681.4	8,487.0	19,615.0	2,523.8	-	N/A	N/A	N/A
CIL	6,025	4,370	5,555	8,525	4,117	8,651	3,569	2,568	4,361	4,474	-	N/A	N/A	N/A
ZIA	6,023	4,370	5,460	7,757	4,117	8,366	3,569	2,358	4,361	4,474	-	N/A	N/A	N/A
Import	0.0	0.0	0.0	101.7	1,715.5	2,745.5	785.5	0.0	1,757.1	0.0	-	1,893.0	0.0	1,580.1
CEL	3,991	4,614	4,618	4,584	3,939	6,881	5,726	6,299	4,286	2,097	-	N/A	N/A	N/A
Export	888.8	1,105.2	205.5	0.0	0.0	0.0	0.0	2,964.7	0.0	360.9	1,580.1	0.0	1,893.0	-
ACP (\$/MW-Day)	666.50	666.50	666.50	666.50	666.50	666.50	666.50	666.50	666.50	666.50	666.50	666.50	666.50	N/A

We note that for the Summer 2025 period, central and southern Illinois (red box) required 9,243.1 MW of capacity to ensure reliability (yellow box) but only 9,328.1 MW of capacity was offered (green box). This left Zone 4 short on capacity in the amount of 101.7 MW. The solution to this shortage was to import the 101.7 MW from MISO regions outside of Illinois (purple box). Zone 4 could import as much as 8,525 MW (black box) to maintain reliability. In the end, because of the ability to import and export capacity within MISO,

the clearing price for capacity settles at the same average rate for the period at \$666.50/MW-Day (blue box).

For the immediate case, it is doubtful that the deployment of the Project in Zone 4 of MISO (central and southern Illinois) will have a noticeable impact on energy or capacity prices for other consumers.

## Conclusions

Analysis indicates that deploying a 600 MW data center in Talkington Township of Sangamon County, Illinois, will not adversely impact the reliability of either the local service network (operated by RECC) or the broader regional grid (operated by MISO). Evidence in support of these conclusions includes:

- The relative isolation of the project's interconnection from the rest of the local electric network that serves RECC's current customers;
- RECC's observance of the technical requirements related to connecting to 345-kV transmission assets owned by Ameren; and,
- System impact analyses conducted by MISO under its FERC mandate to ensure the reliability of the regional grid.

Further, the project is very unlikely to cause increases in electricity supply or delivery costs to RECC customers or other consumers served by the broader regional grid. Evidence in support of these conclusions includes:

- The agreement by the Project developer to pay the costs incurred by RECC to establish a physical service connection between the proposed Project and the MISO grid;
- The commitment by the Project developer to pay a special rate to RECC for the costs of maintaining and operating the physical equipment and systems necessary to deliver electricity to the proposed Project;
- The arrangement by RECC to secure power and electric supply for the proposed Project through its current power marketer through a stand-alone contract and to pass those costs through to the Project developer without markup; and,
- The reality that any impact on wholesale capacity and energy pricing for Illinois consumers resulting from the introduction of the proposed Project

will be mitigated due to the averaging of prices within the region and the ability to import resources from surrounding regions.

As a separate issue, if the Project is not built in Talkington Township then it is almost certain that one or more data center projects of similar size will seek to proceed with interconnection to the same transmission line which spans from Palmyra Missouri to Sugar Creek Indiana. For Sangamon County, the impact of this circumstance would be two-fold:

- Development at the more distant locations would yield the same reliability and cost impacts at the regional grid level; and,
- The economic development and activity associated with the development and operation of the proposed data center would transfer to the new location.

In sum, the Power Bureau finds that the operation of the proposed Project will have minimal – if any – impact on network system reliability or energy costs.

# MARK PRUITT

291 Riverside Drive, Burns Harbor, Indiana 46304 • (219) 921-3828 • markjpruitt@thepowerbureau.com

## ENERGY ECONOMICS AND POLICY CONSULTANT

25+ year track-record in energy project development, commodity procurement, and utility regulation. Strategic negotiator with ability to develop beneficial agreements between stakeholders with conflicting and complex agendas. Well-developed management and communication skills with a reputation for credibility and integrity.

### Core Knowledge and Skill Areas

- |  |   |
|--|---|
| Wholesale & retail energy commodity transactions | Strategy development & implementation     |
| Generation & efficiency technologies             | Statistical modeling & financial analysis |
| Alternative project finance structures           | Negotiations & settlement fulfillment     |
| Procurement & sourcing processes                 | Legislative and regulatory processes      |
| Renewable/Sustainable Portfolio Standards        | Program design and management             |

## PROFESSIONAL EXPERIENCE

**PRINCIPAL, THE POWER BUREAU/ICCAN, CHICAGO, ILLINOIS**

**2011 TO PRESENT**

*Consultant providing energy planning and procurement services to public and private organizations.*

Established specialty consulting practices focused on reducing energy costs and price risks for small and mid-sized consumers. Optimizing existing regulations and market structures to reduce costs and increase optionality. Developing new opportunities by repositioning energy commodity operations from a static cost-center to a risk-management tool that protects client interests. Advise energy generation developers entering new markets under new statutory designs. Advise energy project developers on site selection, wholesale market rate impacts, government and utility policy, project finance, client acquisition, and incentive development.

- |   |   |
|---|---|
| <b>Challenge</b>                        | <b><i>Positioning developers and consumers to capture the benefits available in wholesale power markets.</i></b>  |
| <i>Planning</i>                         | <ul style="list-style-type: none"> <li>▪ Drafting and implementing energy procurement and asset development plans to secure market value, investment returns, and organizational goals.</li> </ul>  |
| <i>Strategic Sourcing</i>               | <ul style="list-style-type: none"> <li>▪ Maximizing benefits of Municipal Aggregation for villages, towns, and counties through procurement methods that reduce transaction premiums</li> <li>▪ Positioning retail electric consumers as wholesale market participants</li> </ul>   |
| <i>Asset Leveraging</i>                 | <ul style="list-style-type: none"> <li>▪ Internal process and governance evaluation</li> <li>▪ Creating alliances among existing market participants to foster development of generation, efficiency and demand response products that deliver consumer value.</li> </ul>   |
| <i>Market Analysis &amp; Monitoring</i> | <ul style="list-style-type: none"> <li>▪ Intervening in regulatory proceedings and drafting state legislation</li> <li>▪ Modeling market price patterns to identify purchasing and selling opportunities</li> <li>▪ Developed Energy Efficiency and Renewable Energy Roadmap for Illinois Department of Commerce and Economic Development.</li> </ul> |
| <i>Project Development</i>              | <ul style="list-style-type: none"> <li>▪ Advised multiple wind and solar project developments in Illinois under the Future Energy Jobs Act</li> <li>▪ Developed specialized project finance structures to leverage the benefits of Qualified Opportunity Zones, Investment Tax Credits, and Qualifying Facilities compensation under PURPA</li> </ul> |



**DIRECTOR, ILLINOIS POWER AGENCY, CHICAGO, ILLINOIS**

**2008 TO 2011**

*State agency Director chartered to reduce and stabilize consumer electricity costs.*

Built a new state agency tasked with reversing substantial consumer price increases resulting from electric deregulation. Gained regulatory approval for statewide portfolio planning and hedging strategies valued at over \$5.3 billion in annual

expenditures. Maintained responsibility for planning and oversight of statewide carbon sequestration, renewable portfolio standard compliance, and synthetic natural gas developments.

<p><b>Challenge</b> Satisfy competing policy interests while reducing consumer costs. Fulfill aggressive and expanding mandates during a period of severe resource restrictions.</p>	<ul style="list-style-type: none"> <li>■ Guided stakeholders in formulating new policies to repositioned default supply electricity purchasing as an actively managed portfolio with cost containment, flexibility, and stability as primary values.</li> <li>■ Delivered \$1.6 billion in electricity cost reductions to Illinois consumers.</li> <li>■ Introduced procurement planning techniques and adapted solutions to specific market conditions resulting in a balanced portfolio to limited year-over-year price volatility.</li> <li>■ Articulated clear objectives and plans to legislators, interest groups, and regulators in public hearings and private meetings to achieve policy consensus.</li> <li>■ Led consistent and fair negotiations that dramatically enhanced success in transaction efforts.</li> <li>■ Re-established Illinois as a leading marketplace for electricity transactions by generating solutions to the consumer cost issue without undermining competitive markets.</li> <li>■ Led regional developers and utilities to secure \$2.6 billion in renewable energy project funding with 20-year power purchase agreements at historically low market rates.</li> <li>■ Spearheaded initiatives to support coal gasification projects valued at \$10 billion.</li> </ul>
<p><b>Change Management</b></p>	
<p><b>Market Positioning</b></p>	



**SENIOR PROGRAM MANAGER, UNIVERSITY OF ILLINOIS, CHICAGO, ILLINOIS**  
2002 TO 2008

Selected to restructure operational functions and reverse losses of small commodity procurement program; following successful achievement of immediate objectives, was promoted in 2004 to assume full P&L responsibility for the unit, overseeing marketing, development and roll-out of new services, and administrative functions.

<p><b>Challenge</b> Improve program value for customers while reversing program losses.</p>	<ul style="list-style-type: none"> <li>■ Ramped program from net loss to profitability, increased book of business from \$2 to \$65 million, tripled net program income, and limited administrative costs to 20% total growth.</li> <li>■ Secured 25% cost savings for participants while reducing price volatility by 20%.</li> <li>■ Restructured procurement events around common credit terms, conditions, and metrics.</li> <li>■ Expanded program from 4 to 39 state agencies and 12 municipalities.</li> <li>■ Captured new customer base by expanding into deregulated electricity markets.</li> <li>■ Led a comprehensive review of the University's energy operations to evaluate competitiveness of campus power plants and utility cost allocation methods.</li> <li>■ Toured customer facilities with management team to promote need for change, assure services value, and monitor key metrics.</li> </ul>
<p><b>Bottom Line Improvements</b></p>	
<p><b>Operations Improvement</b></p>	
<p><b>Team Development</b></p>	



**PROJECT DEVELOPER, NICOR ENERGY SOLUTIONS, NAPEERVILLE, ILLINOIS**  
2000 TO 2002

**Developer of energy generation and management solutions and services for regional clients.**  
Contributed to team development of projects financed through alternative mechanisms including federal Super Energy Services Performance Contract, Utility Energy Services, and Enhanced Use Leasing.

<ul style="list-style-type: none"> <li>■ Standardized project evaluation and proposal formats to increase bid throughput by 15%.</li> <li>■ Coordinated the successful \$14 million Phase 2 energy services contract proposal for the US Department of Energy Fermi National Laboratory.</li> <li>■ Led integration of third-party vendors into project development and cross-marketing sales processes; methods developed were replicated for additional partnership initiatives.</li> </ul>	<p><b>Revenue Growth</b></p>
<p><b>Process Design</b></p>	

ATTACHMENT A: CV OF POWER BUREAU STAFF

GENERAL MANAGER, MIDWESTERN ENERGY CONSULTANTS, MARYLAND HEIGHTS, MISSOURI

1994 TO 2000

***Provider of energy efficiency and security glass coatings.***

Converted a glazing company operating in the small-scale residential sector to a commercially oriented glass safety and security provider. Managed budget planning, sales, staffing, contract negotiations, supplier relations, project management, and administrative functions.

- Performance | ■ Increased year-over-year sales revenues by 9-20% on increased margins, countered seasonality in earnings cycle through expanded customer base and integrated scheduling.
- Positioning | ■ Redirected marketing focus from residential to commercial and institutional; supported by customer research, expanded product lines to include security and safety solutions.



DISTRIBUTION MANAGER, MIDWEST ENERGY RESOURCES, MUNDELEIN, ILLINOIS

1990 TO 1994

***Distributor of 3M insulation, glazing and lighting efficiency products.***

Developed and serviced a network of 3M energy product dealerships in Illinois, Indiana, Iowa, and Missouri. Drafted and evaluated business start-up and expansion plans for dealer network members.

- Financial Performance | ■ Delivered year over year revenue growth of 8-10% and increased share of market in key primary markets throughout region by guiding dealers into commercial applications.

**REPRESENTATIVE CLIENTS**

Argonne National Laboratory	Building Owners and Managers Association	Archdiocese of Chicago
City of Chicago	The Clean Energy Trust	Illinois Retail Merchants Association
Illinois Green Energy Network	Illinois Dept of Commerce	Union Bank
Illinois Municipal Electric Agency	Midwest Renewable Energy Association	Korean Power Exchange
Metropolitan Mayor's Caucus	University of Chicago	Illinois State Senate
Illinois Port District	Chicago Public Schools	Wind & Solar Developers

**EDUCATION**

University of Illinois, Chicago, Illinois  
Master of Business Administration

BRADLEY University, Peoria, Illinois  
Bachelor of Arts

**OTHER ACTIVITIES**

- Adjunct Professor: Master of Science in Energy and Sustainability Program, Northwestern University
- Laboratory Affiliate: Argonne National Laboratory
- Judge: Clean Energy Challenge, Clean Energy Trust
- Mentor: Cleantech Open
- Past Board Member: Midwest Renewable Energy Association



# ZONING

## Protecting Quality of Life



### Topics to Consider

- Consider whether data centers and warehouses are appropriate in the proposed zoning districts
- Evaluate compatibility with surrounding land uses, including appropriate separation distances from certain uses
- Consider the long-term community and environmental impacts

### Summary of Proposed Changes

**Goal: To establish clear and objective zoning standards to address the unique operational, infrastructure, and land use impacts associated with data centers and warehouses, while protecting surrounding properties, and promoting orderly and sustainable development.**

#### Zoning Ordinance Proposed Changes:

##### Definitions

- Separate definitions for data centers and warehouses

##### Data Center Amendments

##### Zoning:

- Data Center are allowed in the ORI, M-1, and M-2 as a Conditional Use which requires a public hearing.

##### Additional document requirements:

- As part of the Conditional Use, a Development Agreement will be required
- A Noise Modeling Report, Energy Consumption Modeling Report and Water Consumption Modeling Report will be required.

##### Chiller regulations:

- Prohibits evaporative chillers utilizing potable water
- Provided separation requirements to residential, education and hospital uses:
  - 1,000' separation requirement to residential for ground-mounted chillers
  - 1,500' separation requirement to residential for roof-mounted chillers
- Additional screening requirement
  - Requirement for sound attenuation for all ground mounted chillers
  - Requirement sound attenuation screen or parapet for all roof-mounted chillers

##### Generator Regulations:

- Prohibits roof-mounted generators
- Requires Tier 4 Final emission standards
- Provided separation requirements to residential, education and hospital uses:
  - 1,000' separation requirement to residential, education and hospital uses for ground-mounted generators
- Additional screening requirement
  - Requirement for sound attenuation for all ground mounted generators

##### Updated performance standards:

- Additional performance standards for data centers
- Updated vibration standards in the ORI, M-1 and M-2 districts

##### Parking Requirement:

- Requiring for "banked" parking to demonstrate that parking regulations for a typical warehouse / industrial user can be provided in the future.

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# ZONING

## Protecting Quality of Life



## Summary of Proposed Change

### Zoning Code Amendments Continued

#### Warehouses amendments

- Changed warehouses to only be permitted as an accessory use to another permitted use in ORI Office, Research, and L Light Industrial District.
- Limited dock to one (1) dock per 40,000 square feet of building gross floor area.

#### Building Code Amendments

- Clarified requirements of sound and vibration studies demonstrating compliance as part of the permit review process and prior to temporary certificate of occupancy including remodeling permits.

## What This Means

- Gives municipality flexibility and control while still allowing the use where appropriate.
- Ensures public input and builds transparency for these types of uses.
- Protect Quality of Life by evaluating the community and environmental impacts on a case-by-case basis
- Creates a simpler and more effective pathway to violation demonstration and thus compliance.
- Creates local accountability for data centers operating within the city limits.



# ZONING

## Research



## Supporting Information

### Zoning

Communities that data centers are permitted by right include Yorkville, West Chicago, Oakbrook, East Dundee, Minooka, Sugar Grove, Bloomington, Hobart IN

Communities that data centers require a conditional use include Naperville, Champaign, Deerfield, Loudoun County VA, Fairfax County VA, Chandler AZ

### Separation Requirements

The City of Aurora is proposing separation requirements from residential uses that are equal to or more stringent than other communities existing standards.

- Yorkville — 500' to residential uses
- Loudoun County, VA — 200' to residential uses; 400' to residential for 2nd stories of buildings
- Fairfax County VA — 200' from residential uses; 300' from residential uses to generator, chillers, & transformers

### Screening Requirements

Communities that require screen walls for equipment includes Loudoun County, VA and Fairfax County, VA. Fairfax County, VA also screens substations.

Yorkville does not require screen walls but does have a 100' Landscape buffer to non-manufacturing zoned land uses and requires a 8' tall berm when adjacent to residential subdivisions.

### Parking Requirements

Parking requirement varies among all of the communities. They range from 1 space per 1000 square feet to Staff Determination. Some base it on the number of employees. In addition to parking requirement for the data center, Minooka required 1 space for each 1,500 square feet of building area as a land bank for potential future parking needs.



# NOISE

Revised 2/17/2026

## Protecting Quality of Life



### Topics to Consider

- Data center agreements with tenants mandate 24/7 availability.
  - Constant heat generation from computer systems require continuous mechanical cooling systems.
  - Need for constant power requires emergency generation for the large power loads of these buildings.
- If unmitigated the 24/7 need for chiller usage can create a pervasive constant noise that neighbors get no relief from.
- Emergency Generator sound during grid power outages can be very loud with many simultaneously running generators needed to meet power demands.
- Emergency Generators must be exercised and tested regularly to ensure they are prepared in case of a grid outage.
- As Data Centers may delay equipment installation as their data halls fill noise generating equipment may not be installed at the time of the first issuance of certificates of occupancy. As such we will need to require sound testing in remodeling permitting processes as well.

### Summary of Proposed Change

**Goal: Protect Residents Quality of Life and require sensitivity to neighbors' quality of life for all non-emergency generated sounds.**

#### Proposed Zoning Language:

- Each new data center will now have to be approved through City Council through the **Conditional Use process**.
- Data centers must adhere to the IL Pollution Control Board - Title 35, Subtitle H: Noise. State noise standard uses 9 octave bands and is difficult to measure. Proposing an Aurora Constant Minimum Noise Threshold as a tougher standard with easier enforcement.
- Data center facility shall comply with the Illinois Pollution Control Board's (IPCB) Environmental Regulations for Noise (Title 35 Environmental Protection Subtitle H: Noise Part, 900 and 901). Should the data center meet or exceed either of these Aurora constant noise threshold minimums dB (A) weighted noise levels at data center site property lines within 1500 ft of residential uses the data center shall be required to provide monitoring reports and a 3rd party acoustical engineer prepared scientific sound study which demonstrates compliance with all applicable sound standards within 30 days of COA request.
- Aurora Constant Minimum Noise Thresholds
  - Daytime hours 59 dB (A) weighted 7am-7pm
  - Nighttime hours 49 dB (A) weighted 7pm-7am

#### Sound Compliance modeling and testing requirements:

- A baseline Third Party Engineer pre-development sound study with the first petitions filed for the development.
- Third Party Engineered Sound modeling and required as part of any zoning entitlement.
- Third Party Engineered Sound study shall demonstrate compliance and comparison to baseline pre project sound study required prior to any temporary or permanent certificate of occupancy request.
- Third Party Engineered Sound study shall demonstrate compliance and comparison to baseline pre project sound study required as part of any subsequent remodeling permit which adds sound producing equipment prior to any temporary or permanent certificate of occupancy request.
- On-Demand Constant Sound Monitoring results and if requested a Third Party Engineered Sound study shall demonstrate compliance and comparison to baseline pre-project sound study required within 30 Days of city request for exceeding the Aurora Constant Minimum Noise Threshold.
- Facilities must provide 24/7 monitoring equipment and meet ongoing performance standards and provide on-demand and annual compliance reporting to the City.
- Data Centers shall additionally be required to "Bank" parking (undeveloped during the data center use) that would have been required for a manufacturing use. This will help maintain more land on the data center site for screening and sound buffering.



# NOISE

Revised 2/17/2026

## Protecting Quality of Life



## Summary of Proposed Change

### Chiller and Cooling Equipment (chillers, fans & compressors)

- Separation to residential uses:
  - If roof mounted 1,500 feet min from screening to closest residential, education and hospital use lot lines.
  - If ground mounted 1,000 feet min from screening to closest residential, education and hospital use lot lines.
- Required to be surrounded by full height attenuation screening

### Emergency Generators

- Separation to residential, education and hospital use lot lines:
  - 1,000 feet min from screening to closest residential, education and hospital use lot lines.
- Prohibited on rooftops
- Required to be surrounded by full height attenuation screening
- Testing and Exercising activities are limited to 9am to 5pm Weekdays and not on holidays, with no more than 2 generators operating simultaneously.

### Proposed Building Code Language:

- 107.2.1.2 Data Center Engineered Modeling details is added to read:  
The code official will require to be filed, engineers report(s) and attestation(s) that the proposed permit details for a data center has been modeled for sound and vibration. The accompanied reports shall demonstrate compliance with all local, State and Federal regulations.
- 107.3.4.2 Data Center Testing Deferred Submittals is added to read:  
The code official will require to be filed, engineers report(s) and attestation(s) that the constructed data center has been tested for sound and vibration. The accompanied testing reports shall demonstrate compliance with all local, State and Federal regulations prior to requests for temporary or full certificates of occupancy where sound and vibration generating equipment are being added

## What This Means

- Sets one of the most stringent separation and noise compliance standards in the country.
- Requires constant monitoring of sound exceedances and sharing of records on request.
- Requires sound studies demonstrating compliance and mitigation plans and timelines upon sound exceedances
- Creates a simpler and more effective pathway to violation demonstration and thus compliance.
- Protects the regional aquifers and encourages modern, low-energy cooling and building systems

## Supporting Information

- Separation Distance to Residential
  - Loudoun Co VA & Fairfax Co VA 200 feet
  - Yorkville IL 500 data center structure to R lot
- Noise Standards and Studies
  - OakBrook IL 55-70 dBA, Hobart IN 65 dBA,
  - At the Residential Lot Noise Standards (Expect a 6dB reduction for every 50 ft of distance)
    - Loudoun Co VA 55dBA, Yorkville IL 50dBA day& 60dBA night
- Generator Testing Hours
  - 9am-5pm Chandler AZ
  - 5am-7pm May to Sept & 11am-5pm Oct to Apr Loudoun Co VA
  - 11am-5pm Yorkville IL



# VIBRATION Revised 2/17/2026

## Protecting Quality of Life



### Topics to Consider

- Data center agreements with tenants mandate 24/7 availability.
  - Need for constant power requires emergency generation for the large power loads of these buildings
- Emergency Generator vibrations during grid power outages can create vibrations in neighboring properties with many simultaneously running generators required to meet power demands
- Emergency Generators must be exercised and tested regularly to ensure they are prepared in case of a grid outage.
- As Data Centers may delay equipment installation as their data halls fill noise generating equipment may not be installed at the time of the first issuance of certificates of occupancy. As such we will need to require sound testing in remodeling permitting processes as well.

### Summary of Proposed Change

**Goal: Protect Residents Quality of Life and require sensitivity to neighbors' quality of life for all non-emergency generated vibrations.**

#### Proposed Zoning Language:

- Each new data center will now have to be approved through City Council through the **Conditional Use process**.
- Data centers must adhere to the revised Aurora bulk restriction performance standards for vibration. Where max permitted displacement in inches = K/frequency in cycles per second.
- Constant vibration monitoring shall be required every 500' of property line within 1,000 feet of residential uses.
- Vibration Isolation mounts are required
- Should the data center exceed the Aurora vibration performance standards at data center site property lines within 1,000 ft of residential uses, the data center shall be required to provide monitoring reports and a 3rd party engineer prepared scientific vibration study which demonstrates compliance with all applicable vibration standards within 30 days of COA request.

In any Neighboring Lot	K
Steady State	0.008
Impulsive	0.015
Less than 8 pulses per 24-hour period	0.037
<b>In any Residential District</b>	
Steady State	0.003
Impulsive	0.006
Less than 8 pulses per 24-hour period	0.015

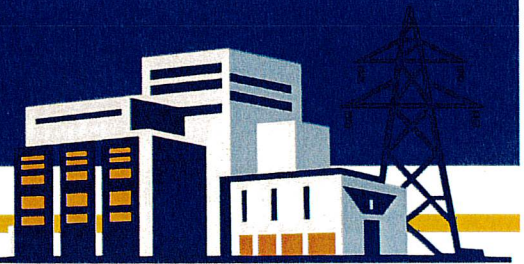
#### Vibration Compliance modeling and testing requirements:

- Third Party Engineered Vibration modeling and required as part of any zoning entitlement.
- Third Party Engineered Vibration study shall demonstrate compliance prior to any temporary or permanent certificate of occupancy request.
- Third Party Engineered Vibration study shall demonstrate compliance as part of any subsequent remodeling permit which adds generator equipment prior to any temporary or permanent certificate of occupancy request.
- Constant Vibration Monitoring results upon request and Third Party Vibration study demonstrating compliance required within 30 Days of city request.
- Facilities must provide 24/7 monitoring equipment and meet ongoing performance standards and provide on-demand and annual compliance reporting to the City.
- Data Centers shall additionally be required to "Bank" parking (undeveloped during the data center use) that would have been required for a manufacturing use. This will help maintain more land on the data center site for vibration buffering.



# VIBRATION Revised 2/17/2026

## Protecting Quality of Life



## Summary of Proposed Change

### Emergency Generators

- Separation to residential, education and hospital use lot lines:
  - 1,000 feet min from screening to closes residential lot line
- Testing and Exercising activities are limited to 9am to 5pm Weekdays and not on holidays, with no more than 2 generators operating simultaneously.

### Proposed Building Code Language:

- 107.2.1.2 Data Center Engineered Modeling details is added to read:  
The code official will require to be filed, engineers report(s) and attestation(s) that the proposed permit details for a data center has been modeled for sound and vibration. The accompanied reports shall demonstrate compliance with all local, State and Federal regulations.
- 107.3.4.2 Data Center Testing Deferred Submittals is added to read:  
The code official will require to be filed, engineers report(s) and attestation(s) that the constructed data center has been tested for sound and vibration. The accompanied testing reports shall demonstrate compliance with all local, State and Federal regulations prior to requests for temporary or full certificates of occupancy where sound and vibration generating equipment are being added

## What This Means

- Mimics the most stringent vibration standards in the country, adding both separation minimums and vibration maximums.
- Limits Generator exercising to a daytime timeframe and limits simultaneous generator testing.
- Requires constant monitoring of vibration exceedances and sharing of records upon request.
- Requires vibration studies demonstrating compliance and mitigation plans and timelines upon vibration exceedances
- Creates a simpler and more effective pathway to violation demonstration and thus compliance.

## Supporting Information

- Separation Standards to Residential
  - Match setbacks from Elk Grove IL
- Vibration Standards
  - Match Residential Vibration standards for Loudoun Co. VA, Killdeer IL, Lee County IL
  - Allows less Vibration than Oakbrook IL, Lake Villa IL, East Dundee IL
- Generator Testing Hours
  - 9am-5pm Chandler AZ
  - 5am-7pm May to Sept 11am-5pm Oct to Apr Loudoun Co VA
  - 11am-5pm Yorkville IL



# ENERGY

## Protecting Quality of Life



### Topics to Consider

- Data centers use enormous amounts of **electricity** – A single large data center can use as much power as tens of thousands of homes.
- Grid strain raises costs for everyone – High, concentrated electricity demand can increase infrastructure costs and contribute to **higher utility rates** for residents and businesses.
- Climate impacts – If powered by fossil fuels, data centers significantly increase **greenhouse gas (GHG) emissions**, conflicting with local and state climate goals.
- **24/7 energy demand** – Unlike most buildings, data centers operate continuously, increasing baseline electricity demand even during peak grid stress events.

### Summary of Proposed Changes

**Goal: Limit excessive energy use and require highly efficient operations.**

- ⇒ Each new data center will have to be approved through City Council through the **Conditional Use** process.
- ⇒ Each new data center will adhere to the most energy-efficient building code published and must be designed to and meet **high energy-efficiency** standards:  
*“Data center facilities shall maintain a maximum Power Usage Effectiveness (PUE) of 1.2.”*
- ⇒ Developers must submit an **Energy Consumption Modeling Report** by a third-party engineer to demonstrate compliance. Existing facilities must meet ongoing performance standards by 2028 and provide **annual compliance reporting** to the City via a public website.
- ⇒ **Required on-site solar** to cover 25% of peak demand OR **on-site battery storage** to cover 50% of peak capacity for 15 minutes, with prioritized distribution to local neighborhoods first in the event of high-peak events.
- ⇒ Decommissioned equipment must be removed to avoid **long-term** environmental & visual blight.
- ⇒ The City of Aurora is supportive of state, regional, or federal requirements that make data centers pay their fair share for utility infrastructure use and upgrades.

### What This Means

- Sets one of the most **stringent energy-efficiency standards for data centers** in the country.
- Prevents local inefficient data centers from driving up electricity demand.
- Encourages modern, low-energy cooling and building systems.
- **Protects residents** from **long-term** utility rate impacts and climate change impacts.



# WATER

## Protecting Quality of Life



### Topics to Consider

- High water consumption — Some data centers consume **millions of gallons of water per year** for cooling.
- Water use can **compete with drinking water needs**, especially during droughts or heat waves.
- **Evaporate cooling** can degrade water quality due to chemical treatment and discharge. There are also concerns with where & how **closed-loop systems** supply and discharge their cooling liquids when they periodically recharge.
- Hidden impacts — Residents may not realize that **digital services rely on local water systems**.
- Despite many data centers recently moving away from high-consumption water cooling, **it's still important for the City to set parameters and ensure local water quality and resources are protected regardless of cooling method.**

### Summary of Proposed Changes

**Goal: Reduce potable water use and protect water quality.**

#### Proposed Changes:

- ⇒ **No potable-water evaporative chillers:**  
*"Evaporative chillers utilizing potable water are prohibited."*
- ⇒ **Strict water efficiency standard:**  
*"Data center facilities shall maintain a maximum Water Usage Effectiveness (WUE) of 0.2."*
- ⇒ **Third-party Water Consumption Modeling Report** required prior to approval.
- ⇒ Removal of obsolete cooling equipment when data centers close or change use.
- ⇒ Facilities must meet ongoing performance standards and provide annual compliance reporting to the City via a public website.
- ⇒ Developers must agree to high fines for non-compliance.

### What This Means

- Prevents data centers from competing with residents for drinking water, and prevents the City and residents from paying for large water use treatment.
- Pushes operators toward air-cooled or recycled-water systems.
- Protects local water quality and reduces chemical runoff risks.
- Makes water use transparent to the City and public.
- Sets performance standards and enforcement methods.



# EMISSIONS

## Protecting Quality of Life



### Topics to Consider

- **Routine generator testing** causes pollution even when there is no outage.
- **Backup diesel generators** emit harmful pollutants including:
  - Nitrogen oxides (NOx)
  - Fine particulate matter (PM2.5)
  - Toxic air contaminants
  - Other greenhouse gases
- Health impacts can include **asthma, heart disease & increased respiratory risk for children and seniors.**

### Summary of Proposed Changes

**Goal: Protect Residents Quality of Life and require sensitivity to neighbors' quality of life for all non-emergency generated sounds.**

- ⇒ No roof-mounted generators.
- ⇒ **Minimum: Tier-4 Final emissions standards** required (cleanest diesel engines available). This is a new state requirement that Aurora will be steadfastly enforcing.
- ⇒ Limits on testing hours and number of generators **running at once**:

*“Testing only between 9am-5pm, weekdays only, no holidays, max 2 generators at a time.”*
- ⇒ 1,000-foot **emergency generator buffer** from residential properties, schools, or hospitals.
- ⇒ Public **annual reporting** of emissions compliance and exceedances via website.
- ⇒ Developers must agree to **high fines** for non-compliance via a development agreement
- ⇒ Data Centers must submit plans to become net-zero greenhouse gas (GHG) emissions by 2050.

### What This Means

- **Reduces** harmful air pollution in nearby neighborhoods.
- **Limits** health impacts from emergency generators.
- **Prevents** late-night generator testing.
- **Improves** accountability and transparency.
- **Reduces** greenhouse gas emissions.



# PRIVACY

## Protecting Your Personal Biometric Information



### What is BIPA?

BIPA is the **Biometric Information Privacy Act**, a law Illinois passed in **2008** to protect people's biometric data — things like fingerprints, face scans, iris scans, voiceprints, and similar biological identifiers — from being collected, stored, or used without clear consent.

Illinois lawmakers recognized that biometric data is uniquely tied to YOU and cannot be changed like a password if it's misused. Early biometric technology was rolling out in places like grocery stores and gas stations, raising concerns about privacy and long-term misuse.

#### Key BIPA protections:

Companies must tell you in writing if they collect your biometric data.

They must clearly explain why they're collecting it and how long they'll keep it.

They must get your written consent before collecting or storing it.

BIPA prohibits companies from selling or profiting from your biometric information.

If a company violates the law, YOU have the right to sue and seek statutory damages without proving actual harm.

### For Consideration

⇒ Biometric data is deeply personal, including face scans, fingerprints, voiceprints, iris scans, and other identifiers tied directly to your body. It follows you for life and cannot be changed like a password.

⇒ Data centers store and process massive amounts of sensitive data, including biometric and AI training data used by companies and governments.

⇒ Illinois has one of the strongest biometric privacy laws in the country, requiring consent, limiting retention, and allowing individuals to enforce their rights.

⇒ Data centers want to repeal or weaken BIPA, claiming it makes it difficult for data centers to develop and operate here.

⇒ If BIPA were repealed or weakened

- . Residents could lose control over how their biometric data is collected, stored, sold, or used.
- . Companies could face fewer obligations to secure or delete biometric information.
- . Individuals could lose the ability to seek remedies if their data is misused or breached.

### Proposed Changes

**Goal: Protect Aurora citizens' biometric data.**

The City is proposing privacy-protecting language in case BIPA is repealed or weakened.

### What This Means

- . Keeps Aurora residents protected even if state law changes
- . Creates local accountability for data centers operating within City limits
- . Signals that privacy and AI governance are community values, not just technical issues



# Research and Supporting Info



## Energy

### Illinois

- To qualify for state incentives, large Data Centers must be **either carbon-neutral or meet green building standards**.
- The City of Chicago, City of Evanston, and Village of Oak Park require large commercial buildings (over 50,000 ft<sup>2</sup>, 20,000 ft<sup>2</sup>, and 10,000 ft<sup>2</sup> respectively) to report **energy consumption annually**. Evanston is in the process of setting performance targets for buildings as well.

### Data Center Power Use Effectiveness (PUE) Averages

- The average PUE of data centers is 1.56; a PUE of 1 would mean the data center's energy consumption is equivalent to only the IT equipment; a target of 1.2 is a common goal of data centers that prioritize energy-efficiency.

### Google/Microsoft

- Leading operators now design new data centers to hit low PUE targets and pair them with clean energy procurement. International companies may already need to meet stringent climate standards.

## Water

### Illinois

- Data centers must meet green building standards, which often include water conservation practices, in order to qualify for state incentives.
- The City of Chicago, City of Evanston, and Village of Oak Park require large commercial buildings (over 50,000 ft<sup>2</sup>, 20,000 ft<sup>2</sup>, and 10,000 ft<sup>2</sup> respectively) to report water consumption annually.
- A data center under development in Minooka, IL initially proposed using 3 million gallons of water a day. They changed the design to a closed-loop cooling system that uses far less water.

### Arizona

- Local governments raised concerns about data centers competing with drinking water during drought conditions.
- Some jurisdictions in the Phoenix Metro now require water modeling before approving new data centers.

### Google

- Publicly committed to becoming "water positive" by replenishing more water than its data centers consume.

## Air Quality

### Illinois & California

- The IL Climate & Reliable Grid Act (CRGA) and California Air Resources Board (CARB) require Tier-4 Final diesel engines for many stationary sources.

### Northern Virginia

- Residents have raised concerns about air quality from generator testing at data centers.

### New York City

- Requires permits and emissions controls for backup generators at large facilities.

### Data Center Industry Trend

- Growing shift toward battery storage and alternative backup systems to reduce diesel reliance.



**1. Add the following to Section 3 Definitions:**

DATA CENTER: A centralized location where computing and networking equipment is concentrated for the purpose of collecting, storing, processing, distributing or allowing access to large amounts of data **with less than 10,000 square feet of processing area and is rated at less than 40 megawatts (MW).**

DATA CENTER, BIG: A centralized location where computing and networking equipment is concentrated for the purpose of collecting, storing, processing, distributing or allowing access to large amounts of data **and that has at least 10,000 square feet of processing area or is rated at 10 megawatts (MW) or greater. Multiple BIG DATA CENTERS may be authorized under one County Board SPECIAL USE Permit.**

**2. Amend Section 5.2 as follows:**

**SECTION 5.2 TABLE OF AUTHORIZED PRINCIPAL USES**

BIG DATA CENTER would be a new land use allowed by County Board Special Use Permit in the AG-2 Agriculture, B-4 General Business, and I-1 Light Industry Zoning Districts, as shown in the table below

Principal USES	Zoning DISTRICTS															
	CR	AG-1	AG-2	R-1	R-2	R-3	R-4	R-5	B-1	B-2	B-3	B-4	B-5	I-1	I-2	
DATA CENTER			S									S		S		
BIG DATA CENTER <sup>34</sup>			B									B		B		

**3. Add new Footnote 34 under Section 5.2 as follows:**

34. A BIG DATA CENTER is subject to the requirements of Section 6.1.7 of the Zoning Ordinance.

**4. Add new Section 6.1.7 as follows:**

**6.1.7 BIG DATA CENTER**

A BIG DATA CENTER County Board SPECIAL USE Permit may only be authorized in the AG-2 Agriculture Zoning DISTRICT, B-4 General Business, or I-1 Light Industry Zoning District, subject to the following standard conditions.

A. General Standard Conditions

- (1) The area of the BIG DATA CENTER County BOARD SPECIAL USE Permit must include the following minimum areas:

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- a. All land that will be exposed to a noise level greater than that authorized to Class A land as established by 35 Ill. Admin. Code Parts 900, 901 and 910 under paragraph 6.1.5I.
  - b. All necessary access lanes or driveways and any required new PRIVATE ACCESSWAYS. For purposes of determining the minimum area of the SPECIAL USE Permit, access lanes or driveways shall be provided a minimum 40 feet wide area.
  - c. All necessary BIG DATA CENTER STRUCTURES and ACCESSORY STRUCTURES including electrical distribution lines, inverters, transformers, common switching stations, and substations not under the ownership of a PUBLICLY REGULATED UTILITY and all water wells that will provide water for the BIG DATA CENTER. For purposes of determining the minimum area of the SPECIAL USE Permit, underground cable installations shall be provided a minimum 40 feet wide area.
- (2) Interconnection to the power grid
- a. The BIG DATA CENTER County Board SPECIAL USE permit application shall include documentation that the applicant or BIG DATA CENTER is in the queue to acquire an interconnection agreement to the power grid.
  - b. Documentation of an executed interconnection agreement with the appropriate electric utility shall be provided prior to issuance of a Zoning Compliance Certificate to authorize operation of the BIG DATA CENTER.
- (3) Right to farm
- a. The owners of the subject property and the Applicant, its successors in interest, and all parties to the decommissioning plan and site reclamation plan hereby recognize and provide for the right of agricultural activities to continue on adjacent land consistent with the Right to Farm Resolution 3425.

B. Minimum LOT Standards

- (1) There are no minimum LOT AREA, AVERAGE LOT WIDTH, or maximum LOT COVERAGE requirements for a BIG DATA CENTER.
- (2) There is no maximum LOT AREA requirement on BEST PRIME FARMLAND.
- (3) Multiple BIG DATA CENTERS may be authorized on the same LOT under one County Board SPECIAL USE Permit.

C. Minimum Standard Conditions for Separations for BIG DATA CENTER from adjacent USES and STRUCTURES

The location of each BIG DATA CENTER shall provide the following required separations as measured from the exterior of the above ground portion of the BIG DATA CENTER STRUCTURES and equipment including fencing:

- (1) BIG DATA CENTER fencing shall be set back from the street centerline a minimum of 40 feet from a MINOR STREET and a minimum 55 feet from a COLLECTOR STREET and a minimum of 60 feet from a MAJOR STREET unless a greater separation is required for screening pursuant to Section 6.1.5M.2.a. but in no case shall the perimeter fencing be less than 10 feet from the RIGHT OF WAY of any STREET.
- (2) For any adjacent LOT that is 10 acres or less in area (not including the STREET RIGHT OF WAY):
  - (a) For any adjacent LOT that is bordered (directly abutting and/or across the STREET) on no more than two sides by the BIG DATA CENTER, the separation shall be no less than 240 feet from the property line.
  - (b) For any adjacent LOT that is bordered (directly abutting and/or across the STREET) on more than two sides by the BIG DATA CENTER, the separation shall exceed 240 feet as deemed necessary by the BOARD.
- (3) For any adjacent LOT that is more than 10 acres in area (not including the STREET RIGHT OF WAY), the separation shall be no less than 255 feet from any existing DWELLING or existing PRINCIPAL BUILDING and otherwise the perimeter fencing shall be a minimum of 10 feet from a SIDE or REAR LOT LINE. This

- separation distance applies to properties that are adjacent to or across a STREET from a BIG DATA CENTER.
- (4) Additional separation may be required to ensure that the noise level required by 35 Ill. Admin. Code Parts 900, 901 and 910 is not exceeded or for other purposes deemed necessary by the BOARD.
  - (5) A separation of at least 500 feet between substations and transmission lines of greater than 34.5 kVA to adjacent dwellings and residential DISTRICTS.
- D. Standard Conditions for Design and Installation of any BIG DATA CENTER.
- (1) Any building that is part of a BIG DATA CENTER shall include as a requirement for a Zoning Compliance Certificate, a certification by an Illinois Professional Engineer or Illinois Licensed Structural Engineer or other qualified professional that the constructed building conforms to Public Act 103-0510 regarding building code compliance and also conforms to the Illinois Accessibility Code.
  - (2) Electrical Components
    - a. All electrical components of the BIG DATA CENTER shall conform to the National Electrical Code as amended and shall comply with Federal Communications Commission (FCC) requirements.
    - b. Burying power and communication wiring underground shall be minimized consistent with best management practice regarding BIG DATA CENTER construction and minimizing impacts on agricultural drainage tile.
  - (3) Maximum Height. The height limitation established in Section 5.3 shall not apply to a BIG DATA CENTER. The maximum height of all above ground STRUCTURES shall be identified in the application and as approved in the County Board SPECIAL USE Permit.
  - (4) Warnings. A reasonably visible warning sign concerning voltage must be placed at the base of all pad-mounted transformers and substations.
  - (5) No construction may intrude on any easement or right-of-way for a GAS PIPELINE or HAZARDOUS LIQUID PIPELINE, an underground water main or sanitary sewer, a drainage district ditch or tile, or any other public utility facility unless specifically

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authorized by a crossing agreement that has been entered into with the relevant party.

- E. Standard Conditions to Protect Agricultural Drainage
- a. The applicant shall endeavor to locate all existing agricultural drainage tile prior to establishing any construction staging areas, construction of any necessary BIG DATA CENTER access lanes or driveways, construction of any BIG DATA CENTER STRUCTURES, any common switching stations, substations, and installation of underground wiring or cabling. The applicant shall contact affected landowners and tenants and the Champaign County Soil and Water Conservation District and any relevant drainage district for their knowledge of tile line locations prior to the proposed construction. Drainage districts shall be notified at least two weeks prior to disruption of tile.
  - b. The location of drainage district tile lines shall be identified prior to any construction and drainage district tile lines shall be protected from disturbance as follows:
    - (a) All identified drainage district tile lines and any known existing drainage district tile easement shall be staked or flagged prior to construction to alert construction crews of the presence of drainage district tile and the related easement.
    - (b) Any drainage district tile for which there is no existing easement shall be protected from disturbance by a 30 feet wide no-construction buffer on either side of the drainage district tile. The no-construction buffer shall be staked or flagged prior to the start of construction and shall remain valid for the lifetime of the BIG DATA CENTER County Board SPECIAL USE Permit and during any deconstruction activities that may occur pursuant to the BIG DATA CENTER County Board SPECIAL USE Permit.
    - (c) Construction shall be prohibited within any existing drainage district easement and also prohibited within any 30 feet wide no-construction buffer on either side of drainage district tile that does not have an existing easement unless specific construction is authorized in writing by all commissioners of the relevant drainage district. A copy of the written authorization shall be provided to the Zoning Administrator prior to the commencement of construction.

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- c. Any agricultural drainage tile located underneath construction staging areas, access lanes, driveways, any common switching stations, and substations shall be replaced as required in Section 6.3 of the Champaign County Storm Water Management and Erosion Control Ordinance.
- d. Any agricultural drainage tile that must be relocated shall be relocated as required in the Champaign County Storm Water Management and Erosion Control Ordinance.
- e. Conformance of any relocation of drainage district tile with the Champaign County Storm Water Management and Erosion Control Ordinance shall be certified by an Illinois Professional Engineer. Written approval by the drainage district shall be received prior to any backfilling of the relocated drain tile and a copy of the approval shall be submitted to the Zoning Administrator. As-built drawings shall be provided to both the relevant drainage district and the Zoning Administrator of any relocated drainage district tile.
- f. All tile lines that are damaged, cut, or removed shall be staked or flagged in such manner that they will remain visible until the permanent repairs are completed.
- g. All exposed tile lines shall be screened or otherwise protected to prevent the entry into the tile of foreign materials, loose soil, small mammals, etc.
- h. Permanent tile repairs shall be made within 14 days of the tile damage provided that weather and soil conditions are suitable or a temporary tile repair shall be made. Immediate temporary repair shall also be required if water is flowing through any damaged tile line. Temporary repairs are not needed if the tile lines are dry and water is not flowing in the tile provided the permanent repairs can be made within 14 days of the damage.
- i. All damaged tile shall be repaired so as to operate as well after construction as before the construction began.
- j. Following completion of the BIG DATA CENTER construction, the applicant shall be responsible for correcting all tile line repairs that fail, provided that the failed repair was made by the Applicant.

F. Standard Conditions for Use of Public Streets

Any BIG DATA CENTER Applicant proposing to use any County Highway or a township or municipal STREET for the purpose of transporting BIG DATA CENTER or Substation parts and/or equipment for construction, operation, or maintenance of the BIG DATA CENTER or Substation(s), shall identify all such public STREETS and pay the costs of any necessary permits and the costs to repair any damage to the STREETS caused by the BIG DATA CENTER construction, as follows:

- (1) Prior to the close of the public hearing before the BOARD, the Applicant shall enter into a Roadway Upgrade and Maintenance agreement approved by the County Engineer and State's Attorney; or Township Highway Commissioner; or municipality where relevant, except for any BIG DATA CENTER for which the relevant highway authority has agreed in writing to waive the requirements of subparagraphs 6.1.9F.1, 6.1.9F.2, and 6.1.9F.3, and the signed and executed Roadway Upgrade and Maintenance agreements must provide for the following minimum conditions:
  - a. The applicant shall agree to conduct a pre- BIG DATA CENTER construction baseline survey to determine existing STREET conditions for assessing potential future damage including the following:
    - (a) A videotape of the affected length of each subject STREET supplemented by photographs if necessary.
    - (b) Pay for costs of the County to hire a consultant to make a study of any structure on the proposed route that the County Engineer feels may not carry the loads likely during the BIG DATA CENTER construction.
    - (c) Pay for any strengthening of STREET structures that may be necessary to accommodate the proposed traffic loads caused by the BIG DATA CENTER construction.
  - b. The Applicant shall agree to pay for costs of the County Engineer to hire a consultant to make a study of any structure on the proposed route that the County Engineer feels may not carry the loads likely during the BIG DATA CENTER construction and pay for any strengthening of

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- structures that may be necessary to accommodate the proposed traffic loads caused by the BIG DATA CENTER construction.
- c. The Applicant shall agree upon an estimate of costs for any other necessary roadway improvements prior to construction.
  - d. The Applicant shall obtain any necessary approvals for the STREET improvements from the relevant STREET maintenance authority.
  - e. The Applicant shall obtain any necessary Access Permits including any required plans.
  - f. The Applicant shall erect permanent markers indicating the presence of underground cables.
  - g. The Applicant shall install marker tape in any cable trench.
  - h. The Applicant shall become a member of the Illinois statewide One-Call Notice System (otherwise known as the Joint Utility Locating Information for Excavators or "JULIE") and provide JULIE with all of the information necessary to update its record with respect to the BIG DATA CENTER.
  - i. The Applicant shall use directional boring equipment to make all crossings of County Highways for the cable collection system.
  - j. The Applicant shall notify the STREET maintenance authority in advance of all oversize moves and crane crossings.
  - k. The Applicant shall provide the County Engineer with a copy of each overweight and oversize permit issued by the Illinois Department of Transportation for the BIG DATA CENTER construction.
  - l. The Applicant shall transport the BIG DATA CENTER loads so as to minimize adverse impact on the local traffic including farm traffic.
  - m. The Applicant shall schedule BIG DATA CENTER construction traffic in a way to minimize adverse impacts

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- on emergency response vehicles, rural mail delivery, school bus traffic, and local agricultural traffic.
- n. The Applicant shall provide as much advance notice as in commercially reasonable to obtain approval of the STREET maintenance authority when it is necessary for a STREET to be closed due to a crane crossing or for any other reason. Notwithstanding the generality of the aforementioned, the Applicant will provide 48 hours notice to the extent reasonably practicable.
  - o. The Applicant shall provide signs indicating all highway and STREET closures and work zones in accordance with the Illinois Department of Transportation Manual on Uniform Traffic Control Devices.
  - p. The Applicant shall establish a single escrow account and a single Irrevocable Letter of Credit for the cost of all STREET upgrades and repairs pursuant to the BIG DATA CENTER construction.
  - q. The Applicant shall notify all relevant parties of any temporary STREET closures.
  - r. The Applicant shall obtain easements and other land rights needed to fulfill the Applicant's obligations under this Agreement.
  - s. The Applicant shall agree that the County shall design all STREET upgrades in accordance with the most recent edition of the IDOT Bureau of Local Roads and Streets Manual.
  - t. The Applicant shall provide written Notice to Proceed to the relevant STREET maintenance authority by December 31 of each year that identifies the STREETS to be upgraded during the following year.
  - u. The Applicant shall provide dust control and grading work to the reasonable satisfaction of the County Engineer on STREETS that become aggregate surface STREETS.
  - v. The Applicant shall conduct a post- BIG DATA CENTER construction baseline survey similar to the pre- BIG DATA CENTER construction baseline survey to identify the

extent of repairs necessary to return the STREETS to the pre- BIG DATA CENTER construction condition.

- w. The Applicant shall pay for the cost of all repairs to all STREETS that are damaged by the Applicant during the construction of the BIG DATA CENTER and restore such STREETS to the condition they were in at the time of the pre- BIG DATA CENTER construction inventory.
  - x. All BIG DATA CENTER construction traffic shall exclusively use routes designated in the approved Transportation Impact Analysis.
  - y. The Applicant shall provide liability insurance in an acceptable amount to cover the required STREET construction activities.
  - z. The Applicant shall pay for the present worth costs of life consumed by the construction traffic as determined by the pavement management surveys and reports on the roads which do not show significant enough deterioration to warrant immediate restoration.
  - aa. Provisions for expiration date on the agreement.
  - bb. Other conditions that may be required.
- (2) A condition of the County Board SPECIAL USE Permit approval shall be that the Zoning Administrator shall not authorize a Zoning Use Permit for the BIG DATA CENTER until the County Engineer and State's Attorney, or Township Highway Commissioner, or municipality where relevant, has approved a Transportation Impact Analysis provided by the Applicant and prepared by an independent engineer that is mutually acceptable to the Applicant and the County Engineer and State's Attorney, or Township Highway Commissioner, or municipality where relevant, that includes the following:
- a. Identify all such public STREETS or portions thereof that are intended to be used by the Applicant during construction of the BIG DATA CENTER as well as the number of loads, per axle weight of each load, and type of equipment that will be used to transport each load.
  - b. A schedule of the across road culverts and bridges affected by the project and the recommendations as to actions, if

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any, required with respect to such culverts and bridges and estimates of the cost to replace such culverts and bridges.

- c. A schedule of the anticipated STREET repair costs to be made in advance of the BIG DATA CENTER construction and following construction of the BIG DATA CENTER.
- d. The Applicant shall reimburse the County Engineer, or Township Highway Commissioner, or municipality where relevant, for all reasonable engineering fees including the cost of a third-party consultant, incurred in connection with the review and approval of the Transportation Impact Analysis.

- (3) At such time as decommissioning takes place, the Applicant or its successors in interest shall enter into a Roadway Use and Repair Agreement with the appropriate highway authority.

G. Standard Conditions for Coordination with Local Fire Protection District

- (1) The Applicant shall submit to the local fire protection district a copy of the site plan.
- (2) Upon request by the local fire protection district, the Owner or Operator shall cooperate with the local fire protection district to develop the fire protection district's emergency response plan.
- (3) Nothing in this section shall alleviate the need to comply with all other applicable fire laws and regulations.

H. Standard Conditions for Allowable Noise Level

- (1) Noise levels from any BIG DATA CENTER shall be in compliance with the applicable Illinois Pollution Control Board (IPCB) regulations (35 Illinois Administrative Code, Subtitle H: Noise, Parts 900, 901, 910).
- (2) The Applicant shall submit manufacturer's sound power level characteristics and other relevant data regarding noise characteristics of proposed BIG DATA CENTER equipment necessary for a competent noise analysis.
- (3) The Applicant, through the use of a qualified professional, as part of the siting approval application process, shall appropriately demonstrate compliance with the above noise requirements as follows:

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- a. The SPECIAL USE Permit application for a BIG DATA CENTER shall include a noise analysis that includes the following:
  - (a) The pre-development 24-hour ambient background sound level shall be identified at representative locations near the site of the proposed BIG DATA CENTER.
  - (b) Computer modeling shall be used to generate the anticipated sound level resulting from the operation of the proposed BIG DATA CENTER within 1,500 feet of the proposed BIG DATA CENTER.
  - (c) Results of the ambient background sound level monitoring and the modeling of anticipated sound levels shall be clearly stated in the application and the application shall include a map of the modeled noise contours within 1,500 feet of the proposed BIG DATA CENTER.
  - (d) The application shall also clearly state the assumptions of the computer model's construction and algorithms so that a competent and objective third party can as simply as possible verify the anticipated sound data and sound levels.
- (4) After construction of the BIG DATA CENTER, the Zoning Administrator shall take appropriate enforcement action as necessary to investigate noise complaints in order to determine the validity of the complaints and take any additional enforcement action as proves warranted to stop any violation that is occurring, including but not limited to the following:
  - a. The Zoning Administrator shall make the Environment and Land Use Committee aware of complaints about noise that have been received by the Complaint Hotline.
  - b. If the Environment and Land Use Committee determines that the noise is excessive, the Environment and Land Use Committee shall require the Owner or Operator to take responsible steps to mitigate the excessive noise.

I. Standard Conditions for Endangered Species Consultation

The Applicant shall apply for consultation with the Endangered Species Program of the Illinois Department of Natural Resources. The Application shall include a copy of the Agency Action Report from the Endangered Species Program of the Illinois Department of Natural Resources or, if applicable, a copy of the Detailed Action Plan Report submitted to the Endangered Species Program of the Illinois Department of Natural Resources and a copy of the response from the Illinois Department of Natural Resources.

J. Standard Conditions for Historic and Archaeological Resources Review

The Applicant shall apply for consultation with the State Historic Preservation Officer of the Illinois Department of Natural Resources. The Application shall include a copy of the Agency Action Report for the State Historic Preservation Officer of the Illinois Department of Natural Resources.

K. Standard Conditions for Acceptable Wildlife Impacts

The BIG DATA CENTER shall be located, designed, constructed, and operated so as to avoid and if necessary mitigate the impacts to wildlife to a sustainable level of mortality.

L. Screening and Fencing

(1) Perimeter fencing

- a. BIG DATA CENTER equipment and structures shall be fully enclosed and secured by a fence with a minimum height of 7 feet.
- b. Knox boxes and keys shall be provided at locked entrances for emergency personnel access.
- c. Vegetation between the fencing and the LOT LINE shall be maintained such that NOXIOUS WEEDS are controlled or eradicated consistent with the Illinois Noxious Weed Law (505 ILCS 100/1 et. seq.). Management of the vegetation shall be explained in the application.

(2) Screening

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- a. A visual screen shall be provided around the perimeter of the BIG DATA CENTER as follows:
  - (a) The visual screen shall be provided for any part of the BIG DATA CENTER that is visible to and located within 1,000 feet of an existing DWELLING or residential DISTRICT except that the visual screen may not be required within the full 1,000 feet of an existing DWELLING or residential DISTRICT provided the Applicant submits a landscape plan prepared by an Illinois Registered Landscape Architect and the BOARD finds that the visual screen in the landscape plan provides adequate screening. However, the visual screen shall not be required if the BIG DATA CENTER is not visible to a DWELLING or residential DISTRICT by virtue of the existing topography.
  - (b) The visual screen shall be waived if the owner(s) of a relevant DWELLING(S) have agreed in writing to waive the screening requirement and a copy of the written waiver is submitted to the BOARD or GOVERNING BODY.
  - (c) The visual screen shall be a vegetated buffer as follows:
    - i. A vegetated visual screen buffer that shall include a continuous line of native evergreen foliage and/or native shrubs and/or native trees and/or any existing wooded area and/or plantings of tall native greases and other native flowering plants and/or an area of agricultural crop production that will conceal the BIG DATA CENTER from view from adjacent abutting property may be authorized as an alternative visual screen subject to specific conditions.
    - ii. Any vegetation that is part of the approved visual screen buffer shall be maintained in perpetuity of the BIG DATA CENTER. If the evergreen foliage below a height of 7 feet disappears over time, the screening shall be replaced.

- iii. The continuous line of native evergreen foliage and/or native shrubs and/or native trees shall be planted at a minimum height of 5 feet tall and shall be planted in multiple rows as required to provide a 50% screen within 2 years of planting. The planting shall otherwise conform to Natural Resources Conservation Service Practice Standard 380 Windbreak/Shelterbreak Establishment except that the planting shall be located as close as possible to the BIG DATA CENTER fence while still providing adequate clearance for maintenance.
- iv. A planting of tall native grasses and other native flowering plants may be used as a visual screen buffer for any BIG DATA CENTER installation that is no more than 8 feet tall provided that the width of planting shall be authorized by the BOARD and the planting shall otherwise be planted and maintained per the recommendations of the Natural Resources Conservation Service Practice Standard 327 Conservation Cover and further provided that the BIG DATA CENTER perimeter fence is opaque.
- v. An area of agricultural crop production may also be authorized by the BOARD as an alternative visual screen buffer with a width of planting as authorized by the BOARD provided that the BIG DATA CENTER perimeter fence is opaque. Any area of crop production that is used as a vegetated visual screen shall be planted annually and shall be replanted as necessary to ensure a crop every year regardless of weather or market conditions.
- vi. Any vegetated screen buffer shall be detailed in a landscape plan drawing that shall be included with the BIG DATA CENTER County Board SPECIAL USE Permit application.

M. Standard Condition for Liability Insurance

- (1) The Owner or Operator of the BIG DATA CENTER shall maintain a current general liability policy covering bodily injury and property damage with minimum limits of at least \$5 million per occurrence and \$5 million in the aggregate.
- (2) The general liability policy shall identify landowners in the SPECIAL USE Permit as additional insured.

N. Water Use

- (1) The use of ground water and/or use of water from a PUBLIC WATER SUPPLY SYSTEM for cooling the processors, other equipment, and the buildings in the BIG DATA CENTER shall be limited to closed-loop cooling systems.
- (2) The SPECIAL USE Permit application shall include the following:
  - a. A description of the proposed cooling system for the processors, other equipment, and the buildings in the BIG DATA CENTER.
  - b. An estimate of the Total Direct Water Usage for cooling the processors, other equipment, and the buildings in the BIG DATA CENTER. The estimate shall include the amounts of ground water and/or water from a PUBLIC WATER SUPPLY SYSTEM to be used for cooling the processors, other equipment, and the buildings.
  - c. A water withdrawal plan detailing proposed ground water withdrawals and use.
  - d. A written explanation by an Illinois Professional Engineer of how the use of ground water and/or the use of water from a PUBLIC WATER SUPPLY SYSTEM for cooling the processors, other equipment and the buildings in the BIG DATA CENTER shall be minimized as much as possible.
  - e. An explanation of how water used for cooling will be disposed of and how disposal of coolant water will be consistent with National Pollutant Discharge Elimination System (NPDES) standards and requirements.

f. The BOARD may request copies of well records from the Illinois State Water Survey and may require an estimate by a qualified hydrogeologist of the likely impact on adjacent water wells.

O. Energy Use and Impact on the Electrical Grid

The SPECIAL USE Permit application shall include a written explanation of the anticipated impacts that the proposed BIG DATA CENTER may have on electric power grid reliability and electricity pricing.

P. Operational Standard Conditions

(1) Maintenance

- a. The Owner or Operator of the BIG DATA CENTER must submit, on an annual basis, a summary of operation and maintenance reports to the Environment and Land Use Committee and any other operation and maintenance reports as the Environment and Land Use Committee reasonably requests.
- b. Any physical modification to the BIG DATA CENTER that increases the number of solar conversion devices or structures and/or the land area occupied by the BIG DATA CENTER shall require a new County BOARD SPECIAL USE Permit. Like-kind replacements shall not require recertification nor will replacement of transformers, cabling, etc. provided replacement is done in fashion similar to the original installation.

(2) Materials Handling, Storage and Disposal

- a. All solid wastes related to the construction, operation and maintenance of the BIG DATA CENTER shall be removed from the site promptly and disposed of in accordance with all Federal, State and local laws.
- b. All hazardous materials related to the construction, operation and maintenance of the BIG DATA CENTER shall be handled, stored, transported and disposed of in accordance with all applicable local, State and Federal laws.

- (3) Vegetation management
  - a. The BIG DATA CENTER SPECIAL USE Permit application shall include a weed control plan for the total area of the SPECIAL USE Permit including areas both inside of and outside of the perimeter fencing.
  - b. The weed control plan shall ensure the control and/or eradication of NOXIOUS WEEDS consistent with the Illinois Noxious Weed Law (55 ILCS 100/1 et. seq.).
  - c. The weed control plan shall be explained in the application.

Q. Standard Conditions for Expiration of BIG DATA CENTER COUNTY Board SPECIAL USE Permit

A BIG DATA CENTER COUNTY Board SPECIAL USE Permit designation shall expire in 10 years if no Zoning Use Permit is granted.

R. Application Requirements

- (1) In addition to all other information required on the SPECIAL USE Permit application and required by Section 9.1.11 A.2., the application shall contain or be accompanied by the following information:
  - a. A BIG DATA CENTER Project Summary, including, to the extent available:
    - (a) A general description of the project, including its approximate AC generating capacity; the maximum number and type of processors, and the potential equipment manufacturer(s).
    - (b) The specific proposed location of the BIG DATA CENTER including all tax parcels on which the BIG DATA CENTER will be constructed.
    - (c) The specific proposed location of all tax parcels required to be included in the BIG DATA CENTER COUNTY Board SPECIAL USE Permit.
    - (d) A description of the Applicant, Owner and Operator, including their respective business structures.

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- b. The name(s), address(es), and phone number(s) of the Applicant(s), Owner and Operator, and all property owner(s) for the BIG DATA CENTER COUNTY Board SPECIAL USE Permit.
  
- c. A site plan for the BIG DATA CENTER indicating the following:
  - (a) The approximate planned location of all BIG DATA CENTER STRUCTURES, property lines (including identification of adjoining properties), required separations, public access roads and turnout locations, access driveways, solar devices, electrical inverter(s), electrical transformer(s), cabling, switching station, electrical cabling from the BIG DATA CENTER to the Substation(s), ancillary equipment, screening and fencing, third party transmission lines, meteorological station, maintenance and management facilities, and layout of all structures within the geographical boundaries of any applicable setback.
  
  - (b) The site plan shall clearly indicate the area of the proposed BIG DATA CENTER COUNTY Board SPECIAL USE Permit as required by subparagraph 6.1.5A.(1).
  
  - (c) The location of all below-ground wiring.
  
  - (d) The location, height, and appearance of all above-ground wiring and wiring structures.
  
  - (e) The separation of all BIG DATA CENTER structures from adjacent DWELLINGS and/or PRINCIPAL BUILDINGS or uses shall be dimensioned on the approved site plan and that dimension shall establish the effective minimum separation that shall be required for any Zoning Use Permit. Greater separation and somewhat different locations may be provided in the approved site plan for the Zoning Use Permit provided that the greater separation does not increase the noise impacts and/or glare that were approved in the BIG DATA CENTER COUNTY Board SPECIAL USE Permit. BIG DATA CENTER structures include substations,

third party transmission lines, maintenance and management facilities, or other significant structures.

- d. All other required studies, reports, certifications, and approvals demonstrating compliance with the provisions of this Ordinance.
  - e. The BIG DATA CENTER SPECIAL USE Permit application shall include documentation that the applicant has provided a complete copy of the SPECIAL USE Permit application to any municipality within one-and-one-half miles of the proposed BIG DATA CENTER as required by Section 6.1.5B.(2)a.(b).
  - f. A municipal resolution regarding the BIG DATA CENTER by any municipality located within one-and-one-half miles of the BIG DATA CENTER must be submitted to the Zoning Administrator prior to the consideration of the BIG DATA CENTER SPECIAL USE Permit by the Champaign COUNTY Board or, in the absence of such a resolution, the Zoning Administrator shall provide documentation to the COUNTY Board that any municipality within one-and-one-half miles of the BIG DATA CENTER was provided notice of the meeting dates for consideration of the proposed BIG DATA CENTER FARM SPECIAL USE Permit for both the Environment and Land Use Committee and the COUNTY Board as required by Section 6.1.5B.(2)a.(c).
  - g. Documentation of an executed interconnection agreement with the appropriate electric utility shall be provided prior to issuance of a Zoning Compliance Certificate to authorize operation of the BIG DATA CENTER as required by Section 6.1.5B.(3)b.
- (2) The Applicant shall notify the COUNTY of any changes to the information provided above that occurs while the COUNTY Board SPECIAL USE Permit application is pending.