

Attached are emails that IID will supply the load. A summary of the emails is as follows: The IID Board assigned Paul Rodriguez to oversee our project. We had a meeting with Paul on October 27, 2025. At that meeting, Paul confirmed that IID had the ability to import the required load via the 230 kV S-line and Path 42/Mirage.

Our consultant, Carl Stills, a 42-year IID veteran, emailed Paul asking who would be responsible for securing transmission for the project, given that it will be treated as a network load. Paul replied: “At this stage, because the project has been submitted as a TCSP project (retail), **IID would be responsible for securing the transmission needed to serve the load.** Based on earlier conversations related to non-firm transmission as an option, this should facilitate allocating capacity for this project.” We confirmed our agreement with that understanding and accepted non-firm transmission.

Request for Update on Facility System — Imperial Data Center

Sebastian Rucci <sebastian@ruccilaw.com>

Tue, Oct 21, 2025 at 5:35 PM

To: "Rodriguez, Paul" <prodriguez@iid.com>

Cc: "Hartney, Mark" <mhartney@allenmatkins.com>, "Strumpfer, Wayne K" <wkstrumpfer@iid.com>, Carl Stills <cestills@sbcglobal.net>

Dear Paul,

I was informed by IID's outside counsel, Mark Hartney, who is handling the arbitration we filed, that you are the appropriate contact for communications regarding our pending projects with IID.

At present, we have an active 330 MW data center project pending before IID (250 MW on the S-line and 80 MW on the R-line). Under the OATT, the next procedural step is to complete the Facility Study and receive a Service Letter. Please confirm whether IID is currently progressing with the facility study and advise on the expected timetable for its completion. On July 25, 2025, IID issued its System Impact Study Report for our 250 MW project, which found: No voltage exceedances or deviations at any monitored buses; No transient stability violations, and concluded: "Study results show that this project can be deemed feasible."

Following a meeting with IID on July 31, 2025, we received an email from the IID on July 31, 2025, stating: "The system impact study was approved and IID will proceed to perform the facility study for the 250 MW Imperial Data Center Campus #1. We estimate a time frame of six weeks to complete the study." However, our facility study was subsequently halted. **Please confirm whether the facility study has resumed, and if so, the anticipated timeline for completion.** We would also appreciate clarification on whether a Service Agreement will be issued upon completion of the Facility Study. While this matter is not currently active, Carl Stills is available to talk about it whenever you have time.

Separately, we also have Data Center #3, a 250 MW project near the Calipatria Switch, which is currently pending. A completed application for this project was submitted on April 14, 2025, and IID executed the study agreement on August 6, 2025. Please coordinate with IID staff and provide a written update on the status of this System Impact Study, including an estimated completion date.

We understand your schedule is demanding and appreciate any update you can provide. Our goal is to ensure these projects continue moving forward as contemplated under the OATT. If progress is being made, we have no interest in continuing arbitration or other litigation. If you need any clarification, please feel free to contact me or Carl Stills, who is authorized to speak for me. Thank you.

Sincerely,

Sebastian
Imperial Valley Computer Manufacturing, LLC
Law Office of Sebastian Rucci, P.C.
16400 Pacific Coast Highway, Suite 212
Huntington Beach, CA 92649
Office: (562) 901-0199
Cell: (330) 720-0398
Fax: (562) 249-6910
Email: Sebastian@RucciLaw.com
Website: ImperialDataCenter.com

FW: Sensitivity Analysis

Hartney, Mark <mhartney@allenmatkins.com>
To: Sebastian Rucci <sebastian@ruccilaw.com>
Cc: "Rodriguez, Paul" <prodriguez@iid.com>

Tue, Oct 21, 2025 at 6:09 PM

Mr. Rucci – please see below regarding information staff is requesting from you. Please respond to Paul Rodriguez, copied here, and cc me. thank you

Both of the IVCM data centers #1 and #2 have accepted SIS reports and have moved on to the FS portion of their assessment. Both of these TCSPs are co-located on the same site off of Aten rd. with a combined 330MW of load (250MW+80MW) fed off of two independent voltage classes. The project requested some sensitivity analyses as follows:

“we are requesting that IID perform another sensitivity at the 330 MW capacity level and look at it not only on the 230 kV "S" Line, but also on the 230 kV KN/KS line via the Mirage/Devers area, and from the the Known Geothermal Resource Area (KGRA) at the Salton Sea from the Hudson Ranch Sub via the MS Line to the KN/KS Line.”

Per Mr. Still’s request **we are unsure if he is requesting a re-evaluation of the 330MW SIS at the POIs outlined above or if he is looking for an assessment of transmission capacity or both? Can we get some clarification from the customer on this request?** Internally we are thinking he is referring to point-to-point transmission but are not sure due to the way the request is presented.

The studies conducted had already assumed that a large part of the MW capacity required for the projects came from imports via the 230kV S-line and Path 42/Mirage (100MW S-line, 170MW Path 42, 60MW from internal sources) so we are unsure how much value that assessment would hold. Regarding the request from the MB-line we informed the customer during a previous meeting that once they identify the internal 3rd party resources to meet their needs and they have an arrangement in place we can then assess the point-to-point transmission request. The resource they mentioned above (Hudson Ranch) is currently committed to a different contract (as far as I am aware) and does not meet the MW capacity required by the data centers as it is only 50MW.

FW: Sensitivity Analysis

Sebastian Rucci <sebastian@ruccilaw.com>

Wed, Oct 22, 2025 at 10:12 AM

To: "Hartney, Mark" <mhartney@allenmatkins.com>

Cc: "Rodriguez, Paul" <prodriguez@iid.com>, "Strumpfer, Wayne K" <wkstrumpfer@iid.com>, Carl Stills <cestills@sbcglobal.net>

Good Morning Paul,

Please proceed with the facility study for the 330 MW project, as originally initiated with the staff on July 31st. In addition, please continue with the sensitivity study that was requested later, so that we can fully assess the potential for imports. It is my understanding that the sensitivity study was already underway, while the facility study had been temporarily paused. We hope that work on the facility study has now resumed.

Carl will be reaching out to you directly to discuss the details and next steps. We are confident that the data center studies are back on track, and in good faith, are **withdrawing our request for arbitration and our public records request**. Corresponding emails to that effect will be sent this morning. We are excited to receive the results of both the facility and sensitivity studies, which will enable us to determine the most appropriate means of serving the data center load in a manner acceptable to IID.

Thank you for your continued cooperation.

Sincerely,

Sebastian
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16400 Pacific Coast Highway, Suite 212
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Website: ImperialDataCenter.com

Initiation of ARBITRATION Under IID's Open Access Transmission Tariff

Sebastian Rucci <sebastian@ruccilaw.com>

Thu, Oct 23, 2025 at 10:08 AM

To: "Hartney, Mark" <mhartney@allenmatkins.com>

Cc: Carl Stills <cestills@sbcglobal.net>, Wayne Kevin Strumpfer <wkstrumpfer@iid.com>, Paul Rodriguez <prodriguez@iid.com>

Good Morning Paul,

Do you have any updates on our questions regarding the processing of our applications, as requested in my email on October 21st at 5:35 pm and continued in the email on the 22nd (yesterday) at 10:12 am? Both are attached. Also, please let me know when you are available to meet with Carl to discuss the projects. Carl expects the meeting to take an hour. Thank you.

Sincerely,

Sebastian
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2 attachments

 **Email to Paul - Update on Facility Study (10-21-25).pdf**
100K

 **Email to Paul - Facility and Sensitivity Analysis (10-22-25).pdf**
111K

Initiation of ARBITRATION Under IID's Open Access Transmission Tariff

Rodriguez, Paul <prodriguez@iid.com>

Mon, Oct 27, 2025 at 2:24 PM

To: Sebastian Rucci <sebastian@ruccilaw.com>, "Hartney, Mark" <mhartney@allenmatkins.com>

Cc: Carl Stills <cestills@sbcglobal.net>

Sebastian,

I just met with our Transmission Planning team, and they recommend that Power Engineers perform the Facility Study. They are willing to commit to weekly or biweekly coordination meetings with Power Engineers to provide direction, scope, and review progress. This approach should position us for a close-to-final draft once Power completes the study. At this point this appears to be our fastest option.

Please let me know if you have any questions.

Regards,

-Paul



Paul Rodriguez
Manager, Deputy, Power Department
IMPERIAL IRRIGATION DISTRICT
333 E Barioni Blvd, Imperial CA 92251
(760) 339-0558 | email: prodriguez@IID.com

Initiation of ARBITRATION Under IID's Open Access Transmission Tariff

Carl Stills <cestills@sbcglobal.net>

Thu, Oct 30, 2025 at 8:02 AM

To: Paul Rodriguez <prodriguez@iid.com>

Cc: Mark Hartney <mhartney@allenmatkins.com>, Sebastian Rucci <sebastian@ruccilaw.com>

Paul

Were you able to determine who needs to secure the transmission for the project since we will be considered a network load?

Carl

Sent from my iPhone

Initiation of ARBITRATION Under IID's Open Access Transmission Tariff

Rodriguez, Paul <prodriguez@iid.com>

Fri, Oct 31, 2025 at 11:11 AM

To: Carl Stills <cestills@sbcglobal.net>

Cc: Mark Hartney <mhartney@allenmatkins.com>, Sebastian Rucci <sebastian@ruccilaw.com>

Good Morning Carl,

At this stage, because the project has been submitted as a TCSP project (retail), IID would be responsible for securing the transmission needed to serve the load. Based on earlier conversations, related to non-firm transmission as an option, this should facilitate allocating capacity for this project.

Regards,

-Paul



Paul Rodriguez
Manager, Deputy, Power Department
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Initiation of ARBITRATION Under IID's Open Access Transmission Tariff

Sebastian Rucci <sebastian@ruccilaw.com>

Fri, Oct 31, 2025 at 1:29 PM

To: "Rodriguez, Paul" <prodriguez@iid.com>

Cc: Carl Stills <cestills@sbcglobal.net>, Mark Hartney <mhartney@allenmatkins.com>

Good Afternoon Paul,

Please **accept this email as confirmation that we agree to non-firm transmission** service from IID to serve the 330 MW load for our data center at Aten and Clark Road. Thank you for confirming that IID will secure the transmission to serve the 330 MW load. The numerous studies to date have confirmed that this is achievable. Your confirmation today aligns with our understanding and discussions with IID personnel over the past year. If any alternative approaches for serving the 330 MW load arise that are acceptable to IID, we would be happy to explore them.

Thank you again for your continued assistance and collaboration.

Best regards,

Sebastian

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