Maxwell Ogunfunwa
Independent Infrastructure Analyst
Carmel, Indiana

February 23, 2026

Bryce Patz, Planning Manager
Department of Metropolitan Development
Division of Planning — Current Planning Section
200 East Washington Street
Indianapolis, IN 46204

Re: Cases 2025-CAP-856 / 2025-CVR-856 — Sabey Data Centers Variance of Use, Decatur Technology Park
Hearing Date: February 26, 2026

Dear Mr. Patz,

I am writing to provide an independent infrastructure analysis of the Sabey Data Centers petition referenced above. My background is in data engineering and operational intelligence, with six years of professional experience designing data pipelines, utility analytics, and resource modeling systems. I have no financial relationship with Sabey Data Centers, AES Indiana, or any party to this petition. This letter is submitted as public input for inclusion in the hearing record.

Over the past several months, I have conducted a detailed review of the primary-source documentation relevant to this petition, including IURC filings, AES Indiana presentations, the draft zoning commitments (CVR-856), utility will-serve letters, independent traffic studies, and published reporting from Mirror Indy, Indiana Capital Chronicle, and other outlets. The findings below are drawn from those sources, each cited by number and listed in full at the end of this letter.

1. The Baseline: What Is Already Approved

The 130-acre site at Kentucky Avenue and Camby Road is not undeveloped land awaiting a use determination. Under Case 2020-CZN-834, it was rezoned to I-2 Industrial in 2020 for the Decatur Technology Park, permitting 6–7 warehouse buildings totaling over 1.2 million square feet plus retail space [35]. The infrastructure question before the Commission is therefore not “data center versus nothing” but “data center versus the already-approved warehouse plan.”

This distinction matters for every infrastructure variable. The American Structurepoint traffic study (November 2025, ITE 12th Edition methodology) projects the warehouse plan would generate 558 AM peak-hour trips versus 111 for the data center an 80% reduction [11]. The warehouse plan would require continuous water service for occupants,

landscaping, and sanitary use at a scale typical of 1.2 million square feet of occupied industrial space. The data center's closed-loop system, discussed below, operates at a fraction of that demand.

2. Grid Capacity and Existing Modernization

AES Indiana's service territory has a total summer generation capacity of 3,956 MW, serving approximately 530,000 customers across 528 square miles [3]. Sabey's proposed 250 MW load, ramping over five years per the AES will-serve letter signed October 21, 2025 [8], would represent approximately 6.3% of that total at full build-out. Critically, this load ramps incrementally not as an overnight demand shock.

AES Indiana was already executing a $1.2 billion grid modernization program (revAMP), approved by the IURC on March 4, 2020, covering substation replacement, transmission rebuilds, 4kV circuit upgrades, downtown network modernization, smart meters, and automated outage rerouting [1]. This modernization was planned and funded before any data center proposals were filed. AES Indiana's current reliability performance 87.3 minutes of average annual outage time versus 126 minutes nationally reflects infrastructure that is 31% more reliable than the national average [5][6].

AES has also deployed 42 LineVision dynamic line rating (DLR) sensors across five transmission lines (69–345 kV), the largest such deployment in the United States at the time [21][22]. Results on the 345 kV line showed a 43% average capacity increase over static ratings, at 7.6% the cost of reconductoring [22]. AES has stated publicly that it targeted this technology specifically to serve "step-load customers like data centers" [23]. Indiana has since passed legislation (Sen. Koch, R) requiring utilities to evaluate advanced transmission technologies [24]. Data center demand is providing the economic justification for grid technology that benefits all ratepayers.

3. Cost Allocation and Ratepayer Protection

Residential rate impact is understandably the foremost concern among Decatur Township residents. Two layers of protection are relevant to this petition.

State law (HEA 1007): Signed by Governor Braun on May 6, 2025, HEA 1007 requires large-load customers to pay at least 80% of the cost of new generation infrastructure built to serve them under Expedited Generation Resource Plans [18]. This is a structural protection that did not exist prior to the current wave of data center proposals.

Zoning commitments (CVR-856): The draft commitments filed February 2, 2026, go further than the state minimum, requiring Sabey to pay "ALL costs for new substation, generation, transmission, and distribution infrastructure" associated with the project [10]. This is a legally binding condition of the variance, not a voluntary pledge.

AES Indiana's will-serve letter confirms its commitment to deliver 250 MW over a five-year ramp but notes that the specific infrastructure cost is "still under study" [8]. AES's public position, stated by Brandi Davis-Handy on September 19, 2025, is that the utility has

"developed a strategy that shows no negative impact to existing customer rates" and that the additional load revenue will "spread fixed costs over a larger amount of electricity sold" [13]. The Indiana OUCC confirmed in September 2025 that AES has incurred "no costs" for data center infrastructure as of that date [17].

Whether the cost-spreading benefit materializes at the scale AES projects remains an open analytical question the answer depends on the ratio of new infrastructure cost to incremental revenue, data AES has not yet released publicly. However, the regulatory and contractual protections in place are materially stronger than what existed when previous large-load industrial projects were approved in Indiana.

4. Water Infrastructure: Closed-Loop Design

Sabey's cooling approach is the single most significant differentiator from both the approved warehouse plan and from other proposed data center projects in the region. The system uses sealed, closed-loop air-cooled chillers that recirculate coolant rather than evaporating water [10][29]. The operational water profile is:

Initial fill: 1,000,000 gallons total, phased as 500,000 gallons for Building A (2028) and 500,000 gallons for Building B (2030) [12].

Annual consumption: 200,000–300,000 gallons per year for both buildings combined, covering restrooms, breakroom use, janitorial needs, landscaping, and humidity control [12]. This is comparable to a small office building.

Municipal source commitment: The zoning commitments legally prohibit private groundwater wells. All water must come from municipal sources (Citizens Water), with emergency disposal following municipal procedures rather than on-site discharge [10].

For context, a comparably sized evaporative-cooled facility would consume approximately 1.8 gallons per kWh of cooling load, millions of gallons per day at 250 MW.

5. Fiscal Impact

The site currently generates approximately $16,000 per year in property tax revenue [26]. Under the previously approved warehouse plan, estimated annual tax revenue was approximately $2.5 million [35]. Sabey's data center, with a 50% personal property tax abatement, is projected to generate $11 million per year, rising to $22 million annually after the abatement period expires [26][28]. This represents a 4.4× to 8.8× increase over the warehouse baseline.

Sabey has committed to 75 full-time permanent positions at an average salary of $104,000 per year (125% of Marion County average), with approximately 115 total on-site jobs expected including tenant employees [12]. CBRE research indicates a 7.4× job multiplier for data center employment, meaning each on-site position supports roughly 7 additional jobs in the local economy through construction, food service, security, and related sectors [25].

Sabey has additionally committed over $5 million toward road improvements in the surrounding area.

6. Conclusion

Based on my independent review of the available primary-source documentation, the Sabey Decatur proposal presents a measurably lower infrastructure burden than the warehouse development already approved for this site across every major variable: traffic volume, water consumption, noise profile, and visual impact. The grid capacity exists to serve the load, the cost allocation framework includes both statutory and contractual protections for existing ratepayers, and the closed-loop cooling technology eliminates the water consumption risk that has defined data center opposition elsewhere in central Indiana.

Open questions remain — particularly around AES's undisclosed infrastructure cost estimates, the long-term energy sourcing strategy, and the adequacy of township fire safety resources. These are legitimate areas for continued regulatory scrutiny. But on the infrastructure fundamentals within the scope of this variance request, the data supports approval.

I respectfully request that this analysis be included in the hearing record for Cases 2025-CAP-856 / 2025-CVR-856.

Respectfully submitted,

Maxwell Ogunfunwa
Independent Infrastructure Analyst
Carmel, Indiana

Cited Sources

The following sources were consulted for this analysis. Bracketed numbers correspond to citations in the text above.

[1] AES Indiana Smart Grid (revAMP) Program — $1.2B TDSIC 7-year plan. IURC approved March 4, 2020. aesindiana.com/smart-grid

[3] IURC 2024 Summer Reliability Forum — AES Indiana Presentation. Total generation capacity: 3,956 MW summer. May 9, 2024.

[5] IURC Electric Utility Reliability Report 2024 — SAIDI data, all Indiana IOU reliability metrics. Filed under 170 IAC 4-1-23(e).

[6] EIA Electric Power Annual 2024, Table 11.1 — National average SAIDI (excl. MED): 126.0 min. eia.gov/electricity/annual

[8] AES Indiana Will-Serve Letter to Sabey Corporation — 250 MW / 5-year ramp. Signed Oct 21, 2025. James Statoff to Clete Casper.

[10] CVR-856 Draft Commitments — Decatur Technology Park. Legally binding zoning conditions. Updated February 2, 2026.

[11] American Structurepoint Independent Traffic Study — Peak-hour trips: warehouse 558 AM / data center 111 AM. ITE 12th Ed. November 2025.

[12] Sabey Decatur Data Center Community Website — Project details, FAQ, water use figures, economic claims. sabeydecaturdatacenter.com

[13] AES Indiana: “Supporting Growth in Central Indiana” — Brandi Davis-Handy statement, September 19, 2025.

[17] OUCC Testimony, Brittan L. Baker (Cause No. 46258, Exhibit 4) — AES stated “no costs incurred” for DC infrastructure. Revised Sept 30, 2025.

[18] HEA 1007 — Indiana Large-Load Cost Allocation. ≥80% of new generation infrastructure costs. Signed May 6, 2025.

[21] Renewable Energy World — AES Indiana LineVision DLR deployment. 42 sensors, 5 transmission lines. August 22, 2024.

[22] LineVision Case Study — AES Indiana DLR results. +43% avg capacity, 7.6% cost of reconductoring. January 3, 2025.

[23] Utility Dive — AES DLR deployed for “step-load customers like data centers.” April 16, 2024.

[24] Pew Charitable Trusts — Indiana ATT legislation (Sen. Koch), IURC evaluation requirement. April 17, 2025.

[25] CBRE Research — “Data Center Growth Has Economic Ripple Effects.” 7.4× job multiplier, 150% wage premium.

[26] Mirror Indy — Sabey Data Center Property Tax & Community Impact. $16K current, $11M/$22M projected. December 19, 2025.

[28] WISH-TV — Sabey Decatur Tax Revenue Reporting. $22M post-abatement projection. December 18, 2025.

[29] Sabey Decatur — Air-Cooled Chiller Technical Reference. Closed-loop cooling specifications. September 2025.

[30] CLWSP — Citizens Long-Term Water Supply Plan (Lebanon / LEAP). 25 MGD phased delivery. Citizens Energy Group.

[35] Case 2020-CZN-834 — Original Decatur Technology Park Zoning. I-2 Industrial, 6 warehouse buildings + retail. 2020.