

AI Comes to Bełchatów

The residents' analysis of the proposed hyperscale data centre in Domiechowice

Prepared by the residents, for the residents of Domiechowice

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Independent citizen analysis. Not commissioned by the gmina, the investor, or any pressure group. Each claim carries a credibility tier ([TIER A-D]). Full bibliography at the end of the report.

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Pytania do Wójta / Questions for the Wójt

Bełchatów–Domiechowice Hyperscale Data Center — Community Meeting Sheet

By the residents, for the residents of Domiechowice village (*sołectwo Domiechowice*, **Gmina Bełchatów** — the rural gmina governed by **Wójt dr Konrad Koc**). We live inside the MPZP plan area, so we have **direct standing** for *uwagi* (art. 8i ust. 1 pkt 1 w zw. z art. 17 pkt 11 i 13 u.p.z.p., Dz.U. 2026 poz. 538) and, as property owners, for any future *skarga do WSA* under art. 101 ust. 1 u.s.g. w zw. z art. 3 § 2 pkt 5 PPSA. **Note:** Gmina Bełchatów (rural) and **Miasto Bełchatów** (the town, a *separate* municipality under the **Prezydent Miasta Bełchatowa**) are administratively distinct. The Domiechowice site + MPZP + this consultation sit in **Gmina Bełchatów**; the town is an affected neighbour, not the deciding authority.

Open meeting: was held 13 Aug 2026, 16:00, Urząd Gminy Bełchatów, ul. Kościuszki 13. **Dyżur projektanta / Designer duty hour:** took place 13 Aug 2026, 17:00–18:00. **Uwagi window:** closed **28 Aug 2026**; this question sheet remains current for written correspondence with the Urząd and councillors — sekretariat@ugbelchatow.pl or paper. **Version:** 1.8 (2 Sep 2026)

Dlaczego to się liczy / Why this matters

The MPZP consultation ran from 31 July and was closed on 28 August 2026. It was the closing is **the first and highest-leverage public moment** at which binding site-specific conditions — noise dB, water m³/day, EMF, PUE, waste-heat reuse — can still be written into the plan. **It is not the only one**: the later *decyzja o środowiskowych uwarunkowaniach* (environmental decision, DŚU) — issued as a rule by the Wójt (art. 75 ust. 1 pkt 4 uioś), with RDOŚ taking over only when one application also covers an always-significant undertaking (art. 75 ust. 1a; see Theme 9) — also has a public-participation stage (art. 39 / art. 54 of the 2008 environmental act, Dz.U. 2026 poz. 670: notice + ≥ 21 -day objection window + public hearing on request), but its scope is narrower (environmental impact, not land-use conditions) and the bar for resident input is higher [TIER A - prognoza §11.10, §13; MPZP §11(4); uioś art. 39/54].

Three risks in plain language:

(a) **The formal investor in the registry has no proven hyperscale track record.** The Polish SPV "DATA CENTER BEŁCHATÓW Sp. z o.o." (KRS 0000882677, share capital 8 000 PLN as of Aug 2026) is owned by "NEXT DC Sp. z o.o." (KRS 0001191076, incorporated 8 Sep 2025, 4 100 PLN revenue, −48 900 PLN net loss in 2025) and "EXUS DIGITAL LDA" (Portugal). The gmina separately told Onet the "main investor" is **Partners Group Holding AG** — but Partners Group does **not appear anywhere in the Polish KRS** for this SPV [TIER A KRS; TIER D Onet]. No hyperscaler tenant, no PPA, no EPC has been announced; the SPV's only registered capital increase to date raised its share capital to 8 000 PLN (record amended 9 Jun 2026) — still a token amount at the declared 500 MW–1 GW scale [TIER A-D, KRS; Onet].

(b) **The draft MPZP permits data centers but locks in NO operating limits.** §11(2) and §28(1)(d) explicitly permit "centra przetwarzania danych (data center)". But the plan writes in **no noise dB cap, no EMF cap, no water-draw volume, no PUE/WUE target, no waste-heat reuse mandate, no battery-storage limit, no green-roof/screening requirement** [TIER A - MPZP §11, §20, §22, §28; prognoza §11.10]. The only operating rule is §11(4): impacts may not exceed "standardy jakości środowiska" *outside* the investor's property line — a generic defer-all.

(c) **The environmental forecast ignores the neighbouring lignite plant + mine entirely.** The 1 841-line *prognoza oddziaływania na środowisko* (SEA forecast, single author Łukasz Beń, 28 Jul 2026) contains **zero mentions** of Elektrownia Bełchatów, KWB Bełchatów mine, "lignit", "węgiel", "PGE", "EU ETS", or "CO₂" — for a site 5–15 km from Europe's #1 lignite emitter. The cumulative-impact section discusses **only dk74 road traffic** [TIER A - prognoza §11.10 L1005-1011].

How this analysis was made. Residents prepared it with the help of AI language tools, which assisted with searching, comparing and summarising sources — the direction of the analysis, the choice of facts and the conclusions are the residents'. Every claim carries a source tag (TIER A–D) and our own calculations are marked [COMPUTED], so every fact can be checked against the source list; despite careful verification, errors are possible.

The questions

87 questions across 17 themes (Themes 1–5 for the Wójt — in written correspondence (open meeting held 13 Aug 2026); Theme 6 for the *projektant* — design duty desk, held 13 Aug 2026, 17:00–18:00; **Theme 7** — Q26–Q29 arising from the "Myth #1" post (24 August 2026); **Theme 8** — Q30–Q38 arising from the water post "Myth #2" (25 August 2026); **Theme 9** — Q39–Q41 on environmental qualification under Regulation Dz.U. 2019 poz. 1839 — DŚU authority, standby generators, phase aggregation; **Theme 10** — Q42–Q46 arising from the waterless-cooling post "Myth #3" (25 August 2026); **Theme 11** — Q47–Q51 arising from the electricity post "Myth #4" (August 2026); **Theme 12** — Q52–Q57 arising from the noise post "Myth #5" (August 2026); **Theme 13** — Q58–Q63 arising from the forest post "Myth #6" (August 2026); **Theme 14** — Q64–Q69 arising from the land-and-costs post "Myth #7" (August 2026); **Theme 15** — Q70–Q75 arising from the jobs post "Myth #8" (August 2026); **Theme 16** — Q76–Q81 arising from the budget-and-benefits post "Myth #9" (August 2026); **Theme 17** — Q82–Q87 arising from the investor's information meeting in Emilin (1 September 2026) on "immersive cooling").

Each question cites a specific Bełchatów artifact (MPZP §, KRS, prognoza R-flag, letter number, named official, date). Each tells you **what answer to demand in writing**, and **why it matters**. Pick 3–8 that matter most to you and paste them into the Polish *uwagi* template in the footer. (Theme 6 questions are framed as "Ask" rather than "Demand" — they are put to the *prognoza*'s author, not to the Wójt.)

Theme 1 — Poważność inwestycji i zamknięcie finansowe / Seriousness & financial close

Q1. Tożsamość inwestora — pogódź oświadczenie gminy z KRS / Investor identity — reconcile gmina statement vs KRS

- **Cite:** DC Bełchatów SPV KRS 0000882677 shareholders (NEXT DC Sp. z o.o. KRS 0001191076 + EXUS DIGITAL, UNIPESOAŁ LDA, NIPC 518894541) [TIER A KRS]; Portuguese registry aggregator confirms EXUS DIGITAL — share capital **€200**, incorporated **16 Jul 2025**, *Sem contas apresentadas* (no accounts filed), sole quota-holder undisclosed [TIER B Rigorbiz/Iberinform] (later Northdata update, Jan 2026: the sole member is Exus Management Renewables SL [TIER B Northdata]); gmina written reply to Onet naming "Partners Group Holding AG, przy wsparciu Exus Digital i Next Mobile" [TIER D Onet, Jun 2026]; **NEXT MOBILE PROSTA SPÓŁKA AKCYJNA KRS 0001084040** (Łódź) is a real, separately-incorporated telecom company — plausibly the gmina's "Next Mobile" — NOT NEXT DC Sp. z o.o. [TIER A Rejestr.io]; a **second DC SPV, DATA CENTER STANISŁAWÓW KRS 0001168621**, sits in the same NEXT/GLOBITEL network (same individual shareholders: Sulik, Gawrych, Szczech, Kozłowski, Sklinda) [TIER A krsly.pl]; DC Bełchatów board member Paweł Szawłowski is concurrently "Country Manager for Poland at Exus Renewables" (Madrid Exus Management Renewables SL) [TIER B Exus Renewables press, Jan 2026]; Partners Group Holding AG absent from every registry consulted and publicly silent on Bełchatów [TIER C Partners Group press archive]; **NEWLY WEB-VERIFIED (10 Aug 2026): Partners Group announced an up-to-€1 bn growth-capital investment in Exus Partners Holding on 4 Oct 2023** [TIER C partnersgroup.com press release; TIER B PE Hub / Ropes & Gray / Cuatrecasas / renews.biz / IREI / Les Echos - all 4–9 Oct 2023]; and **Exus Renewables Europe announced on 19 Dec 2024 that it acquired a 1 056**

MW Polish wind portfolio from Energetyka Polska in July 2024 (plus 53 MW west-central Poland) — Energetyka Polska is one of the named entities in the DC Bełchatów SPV's rejestrio network [TIER C exusrenewables.com press release; TIER B green-forum.eu, 24 Dec 2024]; **so Partners Group + Exus Digital + Next Mobile are NOT three uncoordinated names** — they are tied by a real, publicly-announced €1 bn corporate investment (Partners Group → Exus Partners Holding) and a real Polish corporate footprint (Exus Renewables acquired 1.2 GW of Polish wind from the SPV-network entity Energetyka Polska). **The Portuguese-registry aggregator northdata.de graph for EXUS DIGITAL (NIPC 518894541) does NOT document a parent link to Exus Partners Holding / Exus Management Renewables SL** — current links João Burnay Summavielle + Ed Setúbal Data Lda.; former chain Freshpanoply → Nao Victoria → Exuberant Skills → Luís Abreu Castello → Eólica do Sincelo/Eólica da Linha wind cos [TIER B northdata, uncertain reliability].

- **Demand:** A written, signed statement from Wójt dr Konrad Koc **reconciling the three layers** — i.e. confirming which entity actually commits the ~€1 bn+ to build this campus: (i) the Polish NEXT/GLOBITEL/ENERGETYKA group, (ii) the new Portuguese €200-shell EXUS DIGITAL UNIPESSOAL LDA, or (iii) Partners Group Holding AG. Specifically: **name the sole quota-holder of EXUS DIGITAL UNIPESSOAL LDA (NIPC 518894541)** (it is "Unipessoal" — single-member; according to the Northdata aggregator, after a January 2026 registry update the sole member is Exus Management Renewables SL — we ask for official confirmation); **confirm or deny on the record whether EXUS DIGITAL UNIPESSOAL LDA is a subsidiary of Exus Partners Holding / Exus Management Renewables SL** (the Exus group in which Partners Group invested up to €1 bn in October 2023) — and if so, **why is the investment being run through a newly formed Portuguese company with €200 of share capital (incorporated in July 2025, roughly three weeks before it entered the project's ownership structure), rather than through the Exus group's existing Polish energy companies (the 1,056 MW wind portfolio acquired in July 2024, announced in December 2024); document the contractual chain between Partners Group, EXUS DIGITAL and NEXT DC; explain why the gmina named "Next Mobile" (KRS 0001084040, a Łódź-based telecom sister of GLOBITEL) when the SPV KRS shows "NEXT DC Sp. z o.o." (KRS 0001191076) — are these the same group, two separate participants, or a mis-naming? And clarify whether the investor has informed the gmina about plans for similar data centres in other locations (e.g. the same group's parallel SPV DATA CENTER STANISŁAWÓW, KRS 0001168621).**
- **Why:** Private-equity silence at this stage is normal — the question that deserves an answer is the **gap between the gmina's named lead investor (Partners Group) and the entities actually in the registry (NEXT DC + EXUS DIGITAL + the NEXT/GLOBITEL network)**, not the PE silence itself. A 500 MW–1 GW campus is a multi-billion-euro undertaking; the Polish group is real (verified operating companies in telecom + energy), Partners Group is genuinely invested in the wider Exus group (€1 bn, Oct 2023) and Exus is genuinely present in Poland (1.2 GW wind acquired from Energetyka Polska, Jul 2024), **BUT** none of this verifiable track record is in hyperscale DCs, and the specific vehicle for THIS investment is a two-layer micro-shell (Polish SPV 8 000 PLN ← NEXT DC incorp 8 Sep 2025 + EXUS DIGITAL incorp 16 Jul 2025, €200). The gmina should reconcile on the record which entity is the lead investor and on what timeline that becomes publicly verif-

iable — including whether EXUS DIGITAL UNIPESSOAL LDA is the Portuguese-registered arm of the Partners-Group-backed Exus group (in which case the corporate chain is coherent but the legal-vehicle choice is unusual), or an unrelated entity trading on the "Exus" brand (in which case the gmina's framing is misleading).

Q2. Kapitał SPV i dowody zdolności finansowej u gminy / SPV capital and the financial-capacity evidence the gmina holds

- **Cite:** DC Bełchatów SPV — share capital **8 000 PLN** (as of Aug 2026), registered 2021-02-08; NEXT DC Sp. z o.o. — share capital 6 250 PLN (as of Aug 2026), incorporated **8 Sep 2025**, entered as DC Bełchatów shareholder **27 Oct 2025** (≈ 7 weeks later); 2025 financials: revenue 4 100 PLN, net loss -48 900 PLN [TIER A KRS via Rejestr.io / krs-pobierz.pl]; **EXUS DIGITAL UNIPESSOAL LDA (NIPC 518894541) — share capital €200, incorporated 16 Jul 2025 (≈ 3 weeks before entering NEXT DC), no accounts filed** [TIER B Portuguese registry aggregator Rigorbiz/Iberinform]; **a second DC SPV in the same group, DATA CENTER STANISŁAWÓW KRS 0001168621**, runs in parallel [TIER A krsly.pl].
- **Demand:** "Will the Wójt confirm in writing, before submitting the MPZP to Rada Gminy for adoption, **what financial-capacity evidence the gmina has received from the investor** (e.g. equity commitment letter, named EPC contractor, bank comfort letter), and on what basis the gmina has determined the investor group is financially serious? Specifically: how does a vehicle whose two corporate shareholders have **combined paid-in share capital of roughly €1 450 + €200 $\approx$ €1 650** (NEXT DC + EXUS DIGITAL) credibly commit $\sim$ €1 bn+ to build a 500 MW–1 GW campus, and what evidence has the gmina seen that funding above the SPV is contractually committed (and by whom — Partners Group, EXUS DIGITAL's undisclosed sole quota-holder, or the NEXT/GLOBITEL group)?"
- **Why:** The planning act does not require the Wójt to verify the investor's balance sheet — the MPZP regulates land use, not investor solvency. So shift from a demand (which the Wójt can deflect) to an inquiry about **what the gmina itself already knows**. A two-layer micro-shell (Polish SPV 8 000 PLN $\leftarrow$ NEXT DC incorp 8 Sep 2025 + EXUS DIGITAL incorp 16 Jul 2025, €200) cannot, on its own, build a hyperscale campus; the question is whether the gmina has looked behind the SPV at all — and if so, which entity it looked at.

Q3. Doświadczenie w budowie/eksploatacji hyperscale / Hyperscale track record

- **Cite:** Negative-search verdict in KRS + Portuguese/UK/EU registries — no operating hyperscale facility could be located for DC Bełchatów, NEXT DC, EXUS DIGITAL, TerraByte Data Centers (UK, founded Sep 2024), or Afonso Salema in Polish, Portuguese, Spanish, UK, or EU-wide registries or Tier-A/B business press.
- **Demand:** A list, with addresses and MW commissioned, of hyperscale facilities actually built and currently operated by any entity in the investor chain.
- **Why:** Without an operator with operating experience, the risk of a half-built campus — and a bankrupt SPV leaving the gmina with stranded land-use rights — is non-trivial. Industry expert Jakub Wiech warned Onet that some Polish DC pipeline projects are *"puste inwestycje"* (empty investments) held for resale [TIER D Onet].

Q4. Due diligence na temat podmiotów inwestora / Due diligence on the investor's principals

- **Cite:** The SPV's shareholder EXUS DIGITAL LDA (Portugal) and the broader investor group the gmina has named publicly; reporting on individual principals is in the public record in Portuguese / international press [TIER B/C - Portuguese and international press].
- **Demand:** "What due diligence has the gmina performed on the investor group's principals and track record, is the gmina aware of any ongoing legal proceedings in any jurisdiction involving individuals associated with the SPV or the investor group, and will the gmina's due-diligence findings be disclosed to residents?"
- **Why:** A public official cannot disclose a third party's criminal- investigation status at a public meeting — doing so would breach RODO/GDPR art. 10, and publicly naming a specific individual as a suspect on the basis of an open investigation also exposes **the questioner** to defamation risk under art. 212 § 2 Kodeksu karnego (*zniesławienie*). So **do not name individuals or demand disclosure of criminal data**. Ask instead what the gmina itself has checked — that is answerable, and it shifts the responsibility onto the gmina.

Q5. Anchor tenant, PPA, EPC — co wie gmina / Anchor tenant, PPA, EPC — what the gmina has been told

- **Cite:** No hyperscaler (Microsoft / Google / Meta / Amazon / Oracle / Apple) named as anchor tenant in any Tier-A/B source; Ministry of Climate & Environment told Onet (Jun 2026): "*inwestor na obecnym etapie nie przedstawił informacji na temat skali oddziaływania planowanego przedsięwzięcia, w tym wielkości zużycia wody oraz planowanego systemu chłodowania*" [TIER D Onet quoting Ministry]; 500 MW *warunki przyłączeniowe* confirmed by Wójt (Feb 2026) is a PSE technical-conditions document, **not a supply contract** [TIER A ugbelchatow.pl].
- **Demand:** "Has the investor **shared with the gmina** any of the following: signed anchor-tenant agreement, signed PPA, named EPC contractor, or construction-start date? If not, **on what basis has the gmina determined the project is serious?**"
- **Why:** The Wójt does not hold the investor's commercial documents and will truthfully say so if you ask for them — so ask about **the gmina's own knowledge** instead. Grid-connection conditions + preliminary land contracts are a land-control signal, not financial close.

Q6. Kaucja na rozbiórkę / Decommissioning bond

- **Cite:** MPZP §11 permits data centers as "dopuszcza się" (permitted use) but writes in **no decommissioning bond, no site-restoration obligation, no end-of-life financial assurance** [TIER A - MPZP §11, §28]; MPZP §27 sets a 30 % one-time value-uplift fee (art. 36 ust. 4) — but that is a fee *to the gmina*, not a restoration bond.
- **Demand:** A written commitment to insert, into §11 or a separate plan provision, a requirement that the operator post a decommissioning bond (kaucja na rozbiórkę) before construction start, sized to cover server-hall demolition + soil remediation + e-waste disposal.
- **Why:** A 30 m-tall, 80 %-footprint, ~40 ha industrial campus (§28(3)(f), (3g), (3e)) is not a temporary structure. If the SPV goes bust mid-life, the gmina should not inherit the clean-up bill.

Theme 2 — Środowisko / Environment

Q7. Milczenie prognozy o kopalni i elektrowni / The prognoza's silence on the mine + plant

- **Cite:** *Prognoza oddziaływania na środowisko* (1 841 lines, single author Łukasz Beń, Bełchatów 28 Jul 2026) — **zero hits** on "Bełchatów Power", "Elektrownia", "kopalnia", "węgiel", "lignit", "KWB", "PGE", "EU ETS", "emisja CO₂". Cumulative-impact analysis (§11.10 L1005–1011) discusses **only dk74 road traffic** [TIER A - prognoza §11.10].
- **Demand:** A supplemental cumulative-impact assessment that explicitly models air, water, noise, and traffic interaction between the DC and (a) Elektrownia Bełchatów (5.1 GWe lignite, EU ETS #1 emitter), (b) KWB Bełchatów mine dewatering, (c) the dk74 corridor.
- **Why:** A 500 MW–1 GW DC sited 5–15 km from Europe's largest lignite complex cannot be assessed in isolation. The prognoza's silence is a structural failure of the SEA's purpose.

Q8. PM10 — strefa łódzka już w klasie C / PM10 — Łódź zone already in klasa C (non-attainment)

- **Cite:** The prognoza's own §7 baseline (WIOŚ 2024) states PM10 in strefa łódzka is **klasa C** ("przekracza obowiązujące stężenie dopuszczalne" — exceeds the binding limit). Despite this, §11.11.F concludes DC air emissions "*nie powinny powodować przekroczenia dopuszczalnych norm*" [TIER A - prognoza §7 L253–254 vs §11.11.F L1099–1107].
- **Demand:** A quantified standby-diesel emissions inventory (count, capacity, fuel, test-cycle hours/year of the §11(3)(3) agregaty prądotwórcze) and a cap written into §11.
- **Why:** Adding diesel UPS + truck traffic to an air-shed already in PM10 non-attainment is a cumulative deterioration. Harvard/Frontiers 2026 quantifies backup-generator health damage from a single large AI cluster at \$53–99 M/yr [TIER A - hsph.harvard.edu; frontiersin.org].

Q9. Hałas — limit na granicy terenu / Noise — limit at the property line

- **Cite:** MPZP §11(4) — only operating-emission rule, defers all dB limits to "standardy jakości środowiska" [TIER A - MPZP L152–153]; binding Polish noise limits per **Dz.U. 2014 poz. 112**, Annex Tabela 1 — for the nearest Domiechowice-village house (class **2a "zabudowa mieszkaniowa jednorodzinna"**), the industrial column ceiling is **LAeqD 50 dB / LAeqN 40 dB** at the receptor [TIER A - Dz.U. 2014 poz. 112, WHO Environmental Noise Guidelines]; prognoza §11.10/§11.11.B cites **no measured dB baseline, no acoustic survey, no distance-to-nearest-residence map** [TIER A - prognoza].
- **Demand:** Insert into §11 a clause capping noise **at the property line** at **50 dB LAeqD / 40 dB LAeqN** for industrial sources (the class-2a receptor level from Dz.U. 2014 poz. 112) — *and* require an accredited acoustic-survey baseline (PN-ISO 9613-2) before construction start.
- **Why:** WHO 2009 NNG recommends 40 dB Lnight,outside as a *voluntary health target*; the binding Polish class-2a night-time limit happens to match it (40 dB). Without a number in the plan, the Wójt cannot enforce — every dispute becomes a fresh acoustic measurement at your cost.

Q10. Pobór wody — brak limitu m³/dobę / Water draw — no m³/day cap

- **Cite:** Prognoza §11.15 (L1420–1426): water demand "*może być większe*" — **no m³/day figure** [TIER A - prognoza §11.15; R-4]; MPZP §20 permits **studnie (wells)** as interim until the municipal grid reaches the site — **no volumetric cap** [TIER A - MPZP §20]; gmina told Onet cooling is "closed-loop" — but Ministry of Climate told the same Onet reporter the investor "*has not presented information on... water consumption and the planned cooling system*" [TIER D Onet quoting gmina and Ministry].
- **Demand:** A specific m³/day cap written into §20, sized by an independent hydrological report for the Widawka catchment, and a ban on well water until the cap is set.
- **Why:** At typical hyperscale WUE 1.9 L/kWh (100 % CF), a 500 MW Phase-1 campus consumes ~22 800 m³/day (and ~45 600 m³/day at the full 1 GW build-out) [TIER B - EESI] [COMPUTED - UNVERIFIED pending cooling-tech & capacity-factor disclosure] — and that is the evaporative-cooling (tower) scenario; a sealed dry loop would mean cooling without water, but is committed nowhere (Q31). The regional aquifer is already drawn down by the KWB Bełchatów mine — which the prognoza does not mention even once.

Q11. Odzysk ciepła odpadowego — art. 26 ust. 6 EED / Waste-heat reuse — EU EED Art. 26(6)

- **Cite:** Directive (EU) 2023/1791 (recast EED), **Art. 26(6)** — DCs with total rated energy input > 1 MW **must utilise waste heat** unless technically/economically infeasible (documented per Annex XI) [TIER A - EUR-Lex]; prognoza is **silent** on waste-heat recovery, EU EED, PUE, WUE [TIER A - prognoza; R-6]; MPZP §28(3)(j) bans "spalarni śmieci, miejsc składowania odpadów, recyklingu, biogazowni" — could narrow a future district-heating tie-in if read literally.
- **Demand:** A §11 clause requiring the operator to (a) deliver a waste-heat-reuse feasibility study per EED Art. 26(7) + Annex XI before construction start, and (b) prioritise offtake to Bełchatów town's existing PGE district-heating network.
- **Why:** A 1 GW DC continuously rejects ≥500 MW of low-grade heat. Bełchatów has a district-heating system. Reusing the heat is a legal obligation under EU law, not a courtesy.

Q12. Pełne teksty opinii RDOŚ i PPIS / Full texts of RDOŚ + PPIS letters

- **Cite:** RDOŚ Łódź letter **WOOŚ.411.636.2025.AJa.2 of 29 Dec 2025** and PPIS Bełchatów letter **ZNS.90280.1718.2025 of 7 Jan 2026** — both referenced in prognoza §11.17 (L1525–1527) but **not reproduced in the BIP consultation package** [TIER A - prognoza §11.17; verified by absence from the MPZP text itself].
- **Demand:** We request that the Wójt publish both letters *in full* on the BIP page before the 28 Aug deadline, with all substantive conditions they imposed visible to residents.
- **Why:** The prognoza *characterises* the letters as "uwzględnione" (taken into account) but does not quote them. Residents cannot judge whether their concerns were folded into the plan without the source text. FOI template in the footer enforces this legally.

Theme 3 — Energia / Energy

Q13. Pewna moc w latach 5–20 po wygaszeniu węgla / Firm power in years 5–20 after lignite retirement

- **Cite:** PGE-published *Terytorialny Plan Sprawiedliwej Transformacji Województwa Łódzkiego* (8 Jun 2021) — Elektrownia Bełchatów unit-by-unit closure **2030 (1) → 2036 (12 units total)** [TIER B money.pl, Energetyka24, CIRE, OKO.press]; PGE 2nd nuclear at Bełchatów site — "first stage of analysis" per NucNet 8 Feb 2025, **not before ~late 2030s/2040** [TIER B NucNet]; Wójt Koc told Onet the DC will let lignite "*pracować na 100 proc. mocy*" instead of being throttled by OZE [TIER D Onet].
- **Demand:** A written, year-by-year power source plan for the campus for 2029–2040, naming (a) which generating units supply the DC, (b) what replaces them after 2036, (c) the carbon intensity in each year.
- **Why:** A DC opening 2029–2030 with a 20-year design life will outlive the lignite plant that physically feeds it. There is a ~decade gap (2036 → ~2040) during which neither lignite nor PGE's planned large nuclear can credibly supply 1 GW of firm clean power.

Q14. Ślad węglowy — intensywność sieci / Carbon footprint — grid intensity

- **Cite:** Polish grid carbon intensity **662 gCO₂/kWh in 2023** (Ember European Electricity Review 2024 — highest among the three largest coal-power countries in Europe) [TIER A - Ember]; computed footprint of a 1 GW DC at 100 % capacity factor = **5.3–6.1 Mt CO₂/yr** — i.e. ~18–23 % on top of Elektrownia Bełchatów's current ~27–30 Mt CO₂/yr [COMPUTED - UNVERIFIED pending capacity-factor disclosure] [own computation from IEA/Ember intensity data].
- **Demand:** Annual public disclosure of (a) the DC's capacity factor, (b) its Scope-2 location-based emissions, (c) any PPA structure (annual-match vs 24/7 carbon-free), reported into the EU Database on Data Centres per EED Art. 12 + Delegated Reg (EU) 2024/1364.
- **Why:** "AI powered by Polish lignite" is a reputational risk to the region and the country. The 5.3–6.1 Mt figure is an upper bound; the actual capacity factor is operator-disclosed and not yet public.

Q15. Który GPZ zasila campus — Rogowiec czy Kurnos / Which GPZ feeds the site — Rogowiec or Kurnos

- **Cite:** ugbelchatow.pl (Feb 2026) says "**GPZ w Rogowcu**"; ebelchatow.pl (Apr 2026) and Onet (Jun 2026) say "**GPZ w Kurnosie**" [TIER A/D, discrepancy resolved as: latest official = GPZ Kurnos]; MPZP §22 permits "stacje elektroenergetyczne oraz infrastruktura wysokich i najwyższych napięć" on-site [TIER A - MPZP §22].
- **Demand:** Written confirmation of which GPZ will physically feed the campus, plus a map of the 110 kV line route to it.
- **Why:** The answer changed once. The route determines whose properties are crossed by new transmission — and whether HV/EHV substations sit at the boundary with State Forest land.

Theme 4 — Korzyści dla społeczności i bezpieczeństwo / Community benefit & safety

Q16. Trwałe miejsca pracy — liczba wiążąca / Permanent jobs — binding number

- **Cite:** Wójt's claim (via ebelchatow.pl) of "*kilka tysięcy ludzi*" — refers to **construction-phase jobs; permanent jobs NOT QUANTIFIED** by gmina [TIER D ebelchatow]; Fundacja Carbon Footprint (Marta A. Seweryn): after construction, server farms are "*wysoce zautomatyzowane, zatrudniając zaledwie kilkanaście lub kilkadziesiąt osób*" [TIER D swiatoze].
- **Demand:** A binding minimum permanent-jobs number written into the plan or a side agreement, with penalties if not met.
- **Why:** Thousands-of-jobs promises are the standard DC pitch. The actual operating headcount of a hyperscale campus is typically several dozen to a few hundred — not thousands.

Q17. *Stabilność podatku od nieruchomości / Property-tax stability*

- **Cite:** Wójt's claim of property-tax revenue "*2.5 to 3 times*" the current Elektrownia Bełchatów [TIER D ebelchatow] — UNVERIFIED; the underlying tax base is in flux after **Trybunał Konstytucyjny SK 14/21 (4 July 2023)** declaring the structure definition unconstitutional; the amendment signed 27 Nov 2024 in force 1 Jan 2025 changed how server racks, cable trays, and cooling piping are taxed [TIER B Dudkowiak, Cushman & Wakefield, PwC; TIER A - Dz.U. 2025 poz. 707].
- **Demand:** A third-party (e.g. PwC, KPMG, EY) review of the gmina's property-tax revenue forecast under the post-SK 14/21 regime.
- **Why:** NSA case law on data-centre "structures" was volatile for years before the constitutional reference. The 2025 reform settled definitions but interpretation risk remains. A 2.5–3× Elektrownia claim is plausible only if every rack is taxed at the new building rate.

Q18. *Seveso — zakłady o dużym ryzyku na terenie planu / Seveso — major-accident-hazard sites in the plan*

- **Cite:** MPZP §11(5) explicitly permits "**zakłady o dużym ryzyku**" and "**zakłady o zwiększonym ryzyku wystąpienia poważnej awarii przemysłowej**" (Seveso-class sites) on the whole plan area [TIER A - MPZP §11(5)]; §11(3) also permits on-site **agregatów prądowłórczych** (diesel gensets) and **zbiorników paliw** (fuel tanks) — these are the typical Seveso-threshold triggers for a large DC.
- **Demand:** Either strike §11(5) from the plan, or insert a clause requiring the operator to disclose fuel-storage volumes, submit a Seveso safety report, and fund an emergency-response plan coordinated with the Bełchatów PSP (Państwowa Straż Pożarna).
- **Why:** Permissive Seveso language in a generic industrial plan is a quiet open-ended permission for storing large diesel volumes next to State Forest land.

Q19. *Niezależny monitoring i liaison społeczny / Independent monitoring + community liaison*

- **Cite:** Prognoza §11.3 (L559–562) — verbatim: "*Nie przewiduje się konieczności wprowadzania odrębnego, specjalnego systemu monitoringu wyłącznie dla potrzeb niniejszego planu*" — i.e. **NO site-specific environmental monitoring proposed** for a 500 MW–1 GW campus [TIER A - prognoza §11.3]; nearest WIOŚ air-quality station is in the aggregated Łódź strefa — **none in Domiechowice** [TIER A - prognoza §7].
- **Demand:** A §11 clause requiring the operator to fund (a) a continuous on-site noise + air + water-draw monitoring station, (b) annual public reporting, (c) a paid community-liaison officer with statutory response deadlines.

- **Why:** "Trust us" is not monitoring. Without funded infrastructure, resident recourse relies on ad-hoc WIOŚ complaints — slow, evidentially demanding, and not real-time.

Theme 5 — Proces / Process

Q20. *Wydłużenie terminu konsultacji / Extension of the 28 Aug deadline*

- **Cite:** Consultation window 31 Jul → 28 Aug 2026 = **29 days**, mid-summer holiday season; authorising resolution **Uchwała nr XXI/169/2025 Rady Gminy Bełchatów z 25 września 2025 r.** [TIER A - MPZP]; the BIP package was published 31 Jul 2026 — residents had ~2 weeks before the open meeting to read 13 pp of uchwała + 41 pp of prognoza.
- **Demand:** Formal extension of the 28 Aug deadline by **at least 30 days** (to end-Sep 2026) given (a) holiday season, (b) prognoza's complexity, (c) the absence of full RDOŚ/PPIS letters in the BIP pack.
- **Why:** 29 days in August is below the effective consultation standard for a project of this scale. A defensible process reduces the risk of a later WSA challenge invalidating the plan.

Q21. *Jak i kiedy Wójt odpowie na uwagi / How + when the Wójt will answer comments*

- **Cite:** Art. 8i ust. 1 pkt 1 w zw. z art. 17 pkt 11 i 13 ustawy o planowaniu i zagospodarowaniu przestrzennym (Dz.U. 2026 poz. 538) — Wójt must consider all uwagi and issue a written *rozpatrzenie* [TIER A - legal basis cited in MPZP]; statutory deadline $\approx$ **21 days from consultation closure** (i.e. ~18 Sep 2026); under **art. 8l u.p.z.p.** the *rozpatrzenie uwag* is **not itself appealable** — the challengeable act is the adopted MPZP, via *skarga do WSA* under **art. 101 u.s.g.** [TIER A - art. 8l u.p.z.p.; art. 101 u.s.g.].
- **Demand:** Public commitment from Wójt Koc that (a) every uwaga gets an individual written reply, (b) replies cite the specific clause of the plan being changed or the specific reason for rejection, (c) all replies are published on the BIP page.
- **Why:** A generic "all uwagi considered" form letter is not effective consultation. Resident standing to challenge the adopted MPZP in WSA depends on having exhausted this step.

Theme 6 — Do projektanta (dyżur projektanta) / For the projektant (dyżur projektanta, 13 Aug 17:00–18:00)

The *dyżur projektanta* (13 Aug 2026, 17:00–18:00) was the one direct chance to question **Łukasz Beń** — the single named author of the *prognoza oddziaływania na środowisko* (signed 28 Jul 2026) that this report heavily criticises. These questions are **technical**, not political; the projektant is professionally obligated to answer (or to acknowledge the gap). Frame them neutrally. These questions can still be put to him in writing via the Urząd — cite the prognoza text (§-anchors noted).

Q22. *Zakres oddziaływań skumulowanych / Cumulative-impact scope*

- **Cite:** Prognoza §11.10 limits cumulative-impact analysis to **traffic on droga krajowa nr 74** [TIER A - prognoza §11.10].

- **Ask:** "Could you explain why the cumulative-impact analysis in §11.10 covers only road traffic on dk74 and does **not** address cumulative air, water, or noise interaction with the adjacent **Elektrownia Bełchatów** (~5.1 GWe lignite, ~5–15 km away) and the **KWB Bełchatów** mine's regional aquifer dewatering?"
- **Why:** the silence is the single most consequential gap in the prognoza; getting the author to acknowledge it on the record is itself evidence.

Q23. *Liczba zapotrzebowania na wodę / Water-demand figure*

- **Cite:** Prognoza §11.15 concedes demand "*może być większe*" but gives **zero m³/day figure** for a project the gmina separately claims is 500 MW–1 GW [TIER A - prognoza §11.15].
- **Ask:** "On what basis does the prognoza conclude hydrogeological conditions are "*korzystne*" without (a) a m³/day demand estimate and (b) any reference to the KWB Bełchatów mine's drawdown cone on the same regional aquifer?"
- **Why:** a credible SEA for a hyperscale site would carry a water-demand number and a hydrogeological model that accounts for the mine.

Q24. *Sprzeczność wartości bazowej PM10 / PM10 baseline contradiction*

- **Cite:** Prognoza §7 baseline (WIOŚ 2024) records the Łódź Zone as **PM10 klasa C** (exceeds binding limit); §11.11.F nonetheless asserts DC emissions "*nie powinny powodować przekroczenia dopuszczalnych norm*" [TIER A - prognoza §7 vs §11.11.F].
- **Ask:** "How does §11.11.F's air-quality conclusion follow from §7's klasa-C baseline, given that standby-diesel UPS + traffic would add emissions to an air-shed already in non-attainment?"
- **Why:** the prognoza's own internal contradiction is the kind of point a serious designer will concede.

Q25. *Inwentarze gatunków i monitoring / Species inventories + monitoring*

- **Cite:** Prognoza §8 (no species inventories, no field surveys, no ornithological/chiropterological survey); §11.3 recommends **no site-specific monitoring** for a 500 MW–1 GW campus [TIER A - prognoza §8, §11.3].
- **Ask:** "On what empirical basis does the prognoza conclude *no significant biodiversity impact*, and why is no site-specific air / water / noise / EMF monitoring recommended for a 500 MW–1 GW campus sited next to State Forest land?"
- **Why:** this gets the absence-of-evidence on the record.

Theme 7 — The "Myth #1" post (24 August 2026) — joint "myth-debunking" with the investor

In late August 2026 the Urząd Gminy launched a Facebook series of "myth-debunking" posts about the project, produced "together with the investor". The first post answers the "shell company" accusation with a "✅ Facts" section: the main investor "is" Partners Group (over USD 185bn AUM); the deliverer will be the SPV "created by Exus Digital Lda and Next Mobile PSA — companies active for years in data center development, telecom and cybersecurity".

Independent verification of every claim against the registries (full analysis: «Belchatow_Mit1_PL.pdf»; main report §2.4.8) found that: the AUM figure is true; the PG → Exus → SPV chain exists; **but** no Partners Group entity appears in the SPV's KRS and PG has never publicly named Bełchatów (while in the same month announcing the sale of its Nordic DC platform atNorth); the post misstates the registry record (the shareholder is NEXT DC Sp. z o.o., not "Next Mobile P.S.A."); "active for years in data center development" is contradicted by the Portuguese registry (EXUS DIGITAL: ~1 year old, €200 capital) and by Next Mobile's history (consumer telecom ended 31.05.2022; zero data centers built); and the "no equivalent in our part of Europe" superlative ignores the larger 3.2 GW Lublewo campus announced in March 2026. The post proves that entities exist — not that capital is committed.

Q26. The office as co-author of investor PR — communication format

- **Basis:** the "Myth #1" post on the Urząd Gminy Facebook page with the "together with the investor" declaration [TIER A - post, Aug 2026]; the gmina initiated the MPZP procedure (Resolution No. XXI/169/2025) and runs the consultation; the series has not been published in the Public Information Bulletin (BIP); the post contains no sources, dates, or registry data; the "✅ Facts" section contains at least two claims contradicting the registry (shareholder identity; "active for years in data center development") [TIER A KRS/rejestr.io; TIER B eInforma].
- **Demand:** (a) publication of the series in BIP (not Facebook-only), with the author and source of each claim; (b) a written explanation of the scope of the "together with the investor" co-operation — who drafts the claims, who approves them, whether the office receives any consideration from the investor; (c) **correction of the registry errors** in the "Myth #1" post (shareholder: NEXT DC Sp. z o.o., not "Next Mobile P.S.A."), together with publication of the current KRS 0000882677 extract.
- **Why it matters:** an office that initiated the MPZP and runs the consultation weakens its position as a neutral informer by co-producing persuasive material with the investor in fact-checking format — trust that will be needed when your uwagi are reviewed. A ❌/✅-styled "fact-check" that itself misstates the public registry undermines the credibility of the entire announced series. Facebook (algorithmic, silently editable, excluding non-users) is no substitute for the Bulletin.

Q27. Three versions of the investor structure — which one is binding?

- **Basis:** Onet (15 Jun 2026, the gmina's written reply): "the main one is **Partners Group Holding AG**, supported by Exus Digital and Next Mobile" [TIER D Onet]; the "Myth #1" post (Aug 2026): the SPV "created by **Exus Digital Lda and Next Mobile PSA**" [TIER A - post]; KRS 0000882677 (as of Aug 2026): shareholders **EXUS DIGITAL, UNIPESOAL LDA 60%** (96/160 shares) and **NEXT DC Sp. z o.o. 40%**; share capital 8 000 PLN; FY2025: revenue ~1.5k PLN, loss ~162k PLN [TIER A rejestr.io]. Three dates, three versions, one office.
- **Demand:** a single written statement by the Wójt identifying the **binding** investor structure — with the current KRS extract of the SPV attached — and an explanation of whether "Next Mobile" in the gmina's materials means NEXT MOBILE P.S.A. (KRS 0001084040), NEXT DC Sp. z o.o. (KRS 0001191076), or a naming error.
- **Why it matters:** the gmina–registry discrepancy is the single most important open question about the project's seriousness (§2.4.2 of the main report). Having chosen the "fact-checking" format, the minimum of diligence is agreement with the public registry — all the more so since a KRS extract is instantly and freely available.

Q28. One sentence from Zug — public confirmation by Partners Group

- **Basis:** Partners Group's press archive (FY2025 results of 14.01.2026 and H1 2026 of 15.07.2026) **names neither Belchatów nor any Polish DC investment**; in the H1 2026 release PG announces the **sale of atNorth** — exiting a comparable European DC platform [TIER C partnersgroup.com]; DCD (26.02.2026): a "prospective" investor, project "in its early planning stages" [TIER B DCD]; the only public source of the "main investor" attribution is the gmina itself [TIER D Onet]. At the same time the PG → Exus Partners Holding (€1bn, Oct 2023) → EXUS DIGITAL LDA (60% of the SPV) chain is real and publicly documented [TIER B/C].
- **Demand:** request that the investor issue a **public Partners Group Holding AG statement** (on PG's own channel, not a gmina repost) naming the Belchatów project and the declared scope of involvement — or an honest rephrasing: "according to the investor, the main investor **will be** Partners Group; as of today PG has not publicly confirmed its participation".
- **Why it matters:** USD 186bn AUM (true) is the client money of an entire firm — not a commitment to this project; PG's total historical data-centre exposure is "over USD 4bn since 2021" [TIER C PG LinkedIn], while a 500 MW–1 GW campus is a single multi-billion bet. Only the manager's own statement can settle the present tense "is". One sentence from Zug would close the subject — its absence after six months of public gmina declarations is itself information.

Q29. The series promises "the most important issues" — let it carry numbers

- **Basis:** the post promises to cover "the most important issues" in subsequent instalments [TIER A – post]; the post contains **zero project numbers** (MW, m², PLN, m³/day, jobs, tenant); the Ministry of Climate and Environment (Jun 2026): the investor "has not at this stage presented information on the scale of the planned undertaking's impact, including water usage and the planned cooling system" [TIER D Onet]; the EIA forecast §11.15 likewise has no m³/day figure; the "no equivalent in our part of Europe" superlative ignores the 3.2 GW Lublewo campus announced in March 2026 [TIER B Renewables Now].
- **Demand:** a public commitment that subsequent instalments will state (with document references): connection and target power (MW), site and building area (ha/m²), capex (PLN), water draw (m³/day) and cooling system, the number of **permanent** jobs (separate from construction), anchor-tenant status, and the construction/commissioning schedule.
- **Why it matters:** "debunking myths" without project numbers substitutes authority for verification. Either these numbers exist in the investor's documents — in which case bring them into the consultation (paste into Template A) — or they do not, which is itself the answer to what stage the project is at. The series' ordering (the fund manager's identity before power, water and jobs) is itself a message.

Theme 8 — The "Myth #2" post (25 August 2026) — water and cooling

The series' second post ("together with the investor") answers the accusation of "thousands of m³ of water per day" with a promise: ~50 m³/day (= 150–200 homes, less than the Domiechowice–Emilin solectwo), water "mainly sanitary/social and for safety systems", "not used for cooling". Independent verification (full analysis: «Belchatow_Mit2_PL.pdf», main report §2.4.9) found: the home-comparison arithmetic is correct; **but** "thousands of m³/day" is the published order of magnitude for evaporative cooling at 500 MW (1 400–21 600 m³/day by technology: AWS 0.12 → LBNL 0.48 → legacy 1.8–1.9 L/kWh); the 50 m³/day promise implies WUE ≈ 0.004 L/kWh — consistent only with a **waterless** design committed to in no document (the word "cooling" appears zero times in the MPZP resolution and the EIA forecast); the

Ministry of Climate (Jun 2026) stated the investor presented neither water volumes nor a cooling system; and the gmina itself described cooling to the press as "closed-circuit" with a rainwater tank for **emergency** cooling. Important for the form of your uwagi: **the local plan can bind infrastructure parameters (a m³/day abstraction cap in § 20), but not cooling technology, WUE or noise — those belong to the environmental decision (DŚU), issued as a rule by the Wójt, with RDOŚ involved only on aggregation with an always-significant undertaking (art. 75 ust. 1a uioś; see Theme 9).**

Q30. Where does the 50 m³/day figure come from — and which project phase does it cover?

- **Basis:** the figure appears in no document: not in the MPZP resolution (§ 20 sets no volume), not in the EIA forecast (§ 11.15 explicitly defers demand to "technology"), not in any water-permit application (none filed; 50 m³/day = 10× the ordinary-use threshold of >5 m³/day for business) [TIER A BIP; TIER B Wody Polskie]; the Ministry of Climate (Jun 2026): the investor "has not presented information [...] including water usage and the planned cooling system" [TIER D Onet]. The project declares a 500 MW phase and a ~1 GW ambition (Wójt: "at full one-gigawatt scale it will be the largest in the world").
- **Demand:** in writing: (a) the source of the 50 m³/day figure (water balance? cooling concept? marketing?) with the source document; (b) which phase and which load basis (500 MW IT? electrical?) it refers to, and the target value at ~1 GW; (c) whether and when a water-permit application will be filed.
- **Why it matters:** the first project number in the entire series was published without a source, for an unidentified phase — and in contradiction of the regulator's statement. A number without a phase is decoration, not information.

Q31. Two gmina statements on cooling — the June one or the August one?

- **Basis:** Onet (15.06.2026, the gmina's written reply): cooling systems "are to operate in a closed circuit [...] based on cooling with water circulating in a closed system and electrically driven mechanical cooling", plus a rainwater retention tank "for emergency cooling of installations" [TIER D Onet]; the "Myth #2" post (Aug 2026): "it will not be used for cooling" [TIER A - post]. "Closed loop" does not mean waterless: the evaporative-tower variant consumes 70–80 % of withdrawal (fleets using evaporation report 1 400–21 600 m³/day at 500 MW), the hybrid (adiabatic) variant draws water only during hot spells, and the sealed dry loop — ~0 for cooling [TIER B - fwpcoa.org; TIER B - Uptime Institute 2025]. Three designs, one label, a ~30–400× spread between the extremes.
- **Demand:** a written, unified position: (a) **which cooling topology** — evaporative towers, hybrid (adiabatic), or sealed dry loop; (b) the **design WUE** assumed in the engineering documentation (not in communications); (c) **confirmation** whether water (including rainwater) will be used in the cooling circuit, including emergency use — together with the design capacity of the retention tank (m³) and its autonomy time at full load — and a reference to the engineering document that settles it.
- **Why it matters:** a public office cannot run two contradictory descriptions of the same installation before residents and press. This question has a one-sentence answer — resistance to it will be eloquent. The series continues: the fourth description — oral, delivered by the investor on 1 September 2026 ("immersive cooling") — expands these demands in Q82.

Q32. A water-abstraction cap in MPZP § 20 — the only provision that can bind the promise

- **Basis:** § 20 of the resolution sets the source (network $\geq \phi 150$, interim wells — **with no volume cap**; a single Quaternary well at 10–40 m³/h per the forecast could legally draw 240–960 m³/day) and fire requirements, but no abstraction volume [TIER A BIP]; the consultation until 28.08.2026 is the only window for a permanent planning provision; the MPZP can regulate infrastructure parameters (including a maximum draw), but cannot mandate a cooling technology (that is DŚU scope).
- **Demand (ready-to-paste provision for uwagi):** add to § 20: "Total water abstraction for the data center's operation shall not exceed [X] m³/day annual average and [Y] m³/day maximum daily", with X/Y set to the investor's declared values; simultaneously request that the future environmental decision (DŚU) cover a water balance with seasonal peaks and a cooling-system acoustic study.
- **Why it matters:** if 50 m³/day is a good-faith declaration, the investor has no reason to resist writing it into the plan. If the number is to remain on Facebook only — residents learn exactly what its status is.

Q33. Fire water and the $\phi 150$ main — can the infrastructure carry the promise?

- **Basis:** the MSWiA regulation (Dz.U. 2009 no. 124 item 1030): buildings $> 5\,000\text{ m}^3$ require $\geq 20\text{ dm}^3/\text{s} = 72\text{ m}^3/\text{h}$ external fire flow (production/warehouse halls more); a $\phi 150$ main at 1 m/s carries $\sim 63.6\text{ m}^3/\text{h}$ — **less** than the fire requirement; the regulation then requires tanks (10 m³ per 1 dm³/s of deficit); a single 30–60-minute hydrant/pump test consumes 36–72 m³ — $0.7\text{--}1.4\times$ the entire promised day [TIER A - regulation; own computation].
- **Demand:** information on: planned fire tanks (capacity, location), their refill source, and whether the gmina water utility has issued connection conditions for this site (capacity, intake source) — and until the network exists: how many wells, at what yield, from which aquifer.
- **Why it matters:** "50 m³/day" does not and cannot cover fire events — but residents must know that campus fire safety will be provided without the neighbourhood's taps in the reservoir role. The interim-wells question (§ 20 item 3) also concerns interference with domestic wells.

Q34. Sewage: where to, by what, over whose road?

- **Basis:** 50 m³/day of draw $\approx 40\text{--}47\text{ m}^3/\text{day}$ of sewage; § 21 of the resolution: eventually a sewer, **interim sealed tanks** = 4–5 tanker loads per day (8–10 movements) on local roads until the network is built; the receiving plant is unspecified (the city WOD-KAN plant has $\sim 4\,000\text{ m}^3/\text{day}$ spare; the gmina network — under construction, spare capacity unknown) [TIER A BIP; TIER B wodkan-belchatow.pl].
- **Demand:** a statement on the target sewage receiving plant (which plant, what spare capacity, who funds the connection) and on interim logistics (tanker runs per day, over which roads, liability for spills).
- **Why it matters:** the post promises as much water as a village consumes — and is silent that for years of construction, as much sewage may be trucked through that village daily. A balance without the outflow side is half the information.

Q35. Drought and priority of water rights — what in a dry year?

- **Basis:** the Quaternary aquifer feeding domestic and farm wells is the same level from which § 20 permits the DC's interim draw; IUNG-PIB: in 2025 agricultural drought covered 43% of Łódzkie gminas; the Water Law provides priority of population supply and agriculture over industry in drought conditions [TIER B IUNG-PIB; TIER A Water Law].

- **Demand:** a statement whether any analysis of the DC draw's (network/wells) interference with domestic and farm wells in Domiechowice–Emilin was performed, and whether it will be part of the DŚU assessment.
- **Why it matters:** "50 m³ vs the solectwo" is an average-year comparison. The residents' question is: what happens in the year water runs short — and who is first in line when the taps are throttled.

Q36. Humidification and "mainly" — what exactly does the default category hide?

- **Basis:** even in "waterless" campuses, server halls require winter humidification (process water, counted toward WUE per Microsoft's own definition); "mainly sanitary" at 60 L/person/day would require ≥ 417 staff for sanitary uses to exceed half of 50 m³ — 2–8× the industry norm (50–200 FTE); "safety systems" as a 26–41 m³/day consumer appears in no known water balance [TIER C Microsoft/Meta; own computations].
- **Demand:** a breakdown of the 50 m³/day by category (sanitary / cleaning / humidification / fire-system makeup / other), with the projected staffing per shift.
- **Why it matters:** if the categories do not close (currently they do not), 50 is not a balance — it is a number tailored to the homes comparison.

Q37. Dry-cooling noise — the preemptive question "Myth #3" ignored

- **Basis:** waterless rejection of 500 MW of heat requires on the order of 290+ dry coolers (64–73 dB(A) at 10 m class per unit) and ~9–21 MW of fan power; the MPZP **sets no noise limit**; no acoustic study exists; the nearest homes — Domiechowice and Emilin — directly adjoin the zone [TIER C manufacturer data/Uptime; TIER A MPZP].
- **Demand (before 28.08, regardless of any "Myth #3" post):** (a) a measured acoustic baseline dB(A)/dB(C) in Domiechowice; (b) the projected noise level at the nearest dwelling for 500 MW and for ~1 GW; (c) night-time noise limits; (d) an acoustic study written into the required DŚU scope.
- **Why it matters:** if the "zero water" promise is true, its price is noise and fan energy — physics gives nothing for free. Better to have these numbers in the consultation record than to wait for the series' third instalment.

Q38. The "myths" series vs information duties — consequences of the earlier errors

- **Basis:** the "Myth #1" post contained claims contradicting the KRS (shareholder composition; "active for years in data centers") — see Theme 7, Q26–Q27; "Myth #2" publishes a number without a source and a categorical cooling exclusion that contradicts the gmina's own earlier statement (Q31); both published on Facebook only, not in BIP, without sources; the series is produced "together with the investor" during the consultation of a plan the gmina itself is running.
- **Demand:** (a) publication of the whole series in BIP with authors and sources for each claim; (b) demonstration of a verification procedure before publication (who checked 50 m³ against a water balance? who answers for the registry error in "Myth #1"?); (c) a commitment that every number in the series will reference a publicly available document.
- **Why it matters:** the series' first two instalments lowered, not raised, the office's information credibility — every next one without a verification procedure deepens the problem for an office that is about to adjudicate residents' objections to the same plan.

Theme 9 — Environmental qualification — Regulation Dz.U. 2019 poz. 1839

Project communications speak of a "predicted environmental qualification of the undertaking with its installations and the resulting obligations imposed on the investor". The full text of the Regulation of the Council of Ministers of 10 Sep 2019 (Dz.U. 2019 poz. 1839) makes this concrete in four points. **(1)** The act **contains no separate entry for data centres** — qualification follows automatically from physical parameters, not discretion. **(2)** The "1 ha industrial building footprint" threshold (§3 ust. 1 item 54) is only one of several: **the installations themselves** exhaust the others — standby generators (item 4: fuel combustion for electricity generation at **thermal input** ≥ 25 MW; at 500 MW IT the standby fleet is hundreds of MVA), wells (item 73: ≥ 10 m³/h; item 74: already ≥ 1 m³/h from the same aquifer if other intakes sit within 500 m — a live issue for Domiechowice household wells; item 74 excludes ordinary household use — domestic wells within ordinary use may not qualify, so their classification remains to be confirmed), industrial wastewater treatment (item 80 — **no threshold at all**), sewers ≥ 1 km (item 81), trunk water mains (item 71), roads > 1 km (item 62), overhead lines ≥ 110 kV (item 7 — cables not covered). **(3)** §3 ust. 2 pkt 2–3 are **aggregation clauses**: extensions and phases sum up — phasing 500 MW $\rightarrow$ ~ 1 GW cannot evade screening. **(4)** Authority: as a rule the **Wójt** (art. 75 ust. 1 pkt 4 uioś, Dz.U. 2026 poz. 670); if one application also covers an always-significant undertaking (e.g. an overhead line ≥ 220 kV and ≥ 15 km — §2 item 6), RDOŚ Łódź takes over the whole application (art. 75 ust. 1a) — and RDOŚ **issues a binding agreement** on implementation conditions in every case (art. 77 ust. 1). Full analysis: main report §6.3.

Q39. Which authority will issue the environmental decision — the Wójt or RDOŚ?

- **Basis:** art. 75 ust. 1 uioś (Dz.U. 2026 poz. 670): the RDOŚ catalogue covers roads, overhead lines, pipelines, nuclear objects, wind farms — **a data centre is not in it** $\rightarrow$ competent: **the Wójt of Gmina Belchatów** (item 4); art. 75 ust. 1a: one application covering ≥ 2 undertakings of different competence, including an always-significant one $\rightarrow$ the whole file to RDOŚ; §2 item 6 of Dz.U. 2019 poz. 1839: an overhead line ≥ 220 kV and ≥ 15 km is always-significant [TIER A - uioś; TIER A - Regulation].
- **Demand:** written information on: (a) whether a new ≥ 110 kV power line is planned (voltage, route, overhead or cable) and from when; (b) a copy of the DŚU application filed 22.12.2025 (file ref ZŚ.6220.23.2025; proceeding suspended 27.05.2026 pending the OOS report [TIER A - UG inter-session information]) together with the undertaking's information card, and confirmation of whether one bundled application was filed (covering e.g. a ≥ 220 kV line); (c) confirmation of which authority will run the proceeding.
- **Why it matters:** the authority decides whether the decision is made locally or regionally. With the Wójt, the same office runs the plan consultation, the "Myths" campaign with the investor and — as a rule — the environmental decision; independent control rests with RDOŚ's binding agreements (art. 77) and the PPIS opinion — residents should know this structure.

Q40. Total thermal input of the standby generators and fuel tanks — the 25 MW threshold

- **Basis:** §3 ust. 1 item 4 of the Regulation: fuel-combustion installations for electricity generation with thermal input ≥ 25 MW (solid fuel ≥ 10 MW) are "potentially significant" undertakings; §11(3) of the uchwała expressly admits "standby power systems, including generators" and "fuel tanks"; at 500 MW IT the standby fleet is hundreds of MVA (2–3 MW-class units), so the thermal-input threshold is exceeded already in phase one — the installation alone qualifies the undertaking [TIER A - Regulation; TIER A - MPZP §11(3)].

- **Demand:** the planned total electrical and thermal capacity of the generators, their number and layout (per hall / per campus), fuel-tank volumes, and the periodic-test regime (number of start-ups per year, permitted time windows, noise limit during tests).
- **Why it matters:** this is the one installation that qualifies the entire undertaking by itself — and simultaneously the main source of tonal/low-frequency noise (cf. Q37). One question, two threads: procedural and acoustic.

Q41. Will the phases be summed up? An anti-salami-slicing record for the agreements and the plan

- **Basis:** §3 ust. 2 pkt 2–3 of the Regulation: successive extensions sum with earlier ones (unless covered by prior DŚUs), and sub-threshold undertakings of the same kind on one plant's territory sum towards the thresholds; the declared 500 MW → ~1 GW path means each "smaller" phase adds its parameters to the previous ones [TIER A - Regulation].
- **Demand:** (a) to RDOŚ and PPIS (the letters cited in prognoza §11.17) — a request for written confirmation that full phase aggregation will be applied at the screening in the ongoing DŚU proceeding (opened 22.12.2025, currently suspended [TIER A - UG inter-session information]); (b) to the plan — that the indicators in §20/§28 be set **cumulatively for the whole site** (max water draw, building footprint, power), not "per phase".
- **Why it matters:** the only way around the 1 ha and 25 MW thresholds is slicing the investment into sub-threshold pieces; the regulation anticipates and blocks this ("on the territory of one plant"). The authorities should confirm this in writing before the first application arrives.

Theme 10 — The "Myth #3" post (25 August 2026) — waterless cooling and its price

The third post in the series ("together with the investor") answers the charge of an "environmental disaster" and "enormous amounts of water": cooling is to be **waterless** — a hybrid system with a closed coolant loop, mostly "passive" free cooling with outside air, plus "high-efficiency chiller aggregates" in hot spells [TIER A - post]. It is the series' first technology description — an indirect answer to Q31 — and simultaneously the **third description of the installation in three months** (June: "water circulating in the system" + an emergency rainwater tank; August: "will not be used for cooling"; August: hybrid dry loop), none of it legally binding: the word "cooling" appears not once in the MPZP resolution or the forecast (full-text verification). Full analysis: «Belchatow_Mit3_PL.pdf» (Polish).

Q42. How many hours a year does free cooling actually run — and what is the seasonal PUE?

- **Basis:** the post: passive cooling "for most of the year"; in central Poland free cooling typically covers most hours of the year depending on liquid supply temperature [COMPUTED - climate normals]; no parameter given (hours, seasonal PUE, supply temperature) [TIER A - post].
- **Demand:** annual free-cooling hours (monthly breakdown), design seasonal PUE (annual and July), design liquid supply temperature, and the switchover temperature to mechanical cooling.
- **Why it matters:** "most of the year" and "high-efficiency" are adjectives, not parameters — these four numbers determine energy, noise and peak power all year round.

Q43. What peak power do the chiller aggregates draw — and does the grid-connection application cover it?

- **Basis:** at full mechanical cooling, compressor draw $\approx \text{heat} \div \text{COP} = \sim 120\text{--}190 \text{ MW}$ (heat 550–570 MW, i.e. IT plus site overhead at PUE $\sim 1.1\text{--}1.14$, $\div \text{COP } 3\text{--}4.5$ in heat; EER ~ 3 at 35 °C per REHVA) — the campus peak rises to $\sim 630\text{--}710 \text{ MW}$ (+26–42%), precisely at hours of peak grid load; after aggregation to $\sim 1 \text{ GW}$ — to $\sim 1.26\text{--}1.4 \text{ GW}$ [COMPUTED; TIER C - REHVA].
- **Demand:** (a) total nominal capacity and number of chiller units; (b) confirmation that the grid-connection application covers the cooling system's peak draw (with margin for load diversity and N+1 staging); (c) whether standby generators are scheduled to run for own needs during heatwaves.
- **Why it matters:** the summer power peak is a grid-balance issue, not a detail — and the post does not mention it once.

Q44. How much noise does the cooler fleet generate at the plot boundary — and when is the acoustic study? (expands Q37)

- **Basis:** waterless rejection of 500 MW requires $\sim 290\text{--}550+$ dry coolers depending on unit class (noise class 64–73 dB(A) at 10 m per catalogs; real project: 44 coolers per 75 MW) and $20\,000\text{--}42\,000 \text{ m}^3/\text{s}$ of total air flow; fans draw 9–21 MW in typical operation, up to $\sim 25\text{--}35 \text{ MW}$ at the summer design point; the aggregates add compressors and condenser fans; the MPZP sets no dB limit and no acoustic study exists [TIER C - manufacturer catalogs; TIER A - MPZP].
- **Demand:** (a) a measured dB(A)/dB(C) baseline in Domiechowice; (b) design noise level at the nearest dwelling for 500 MW and $\sim 1 \text{ GW}$; (c) night-hour limits; (d) an acoustic study in the required DŚU scope.
- **Why it matters:** waterlessness is paid for in noise and fan energy — physics gives nothing for free; Q37 tabled these demands preemptively, and the "Myth #3" post ignored them.

Q45. Which of the four installation descriptions is current — and what does the rainwater tank cool? (expands Q31)

- **Basis:** June (Onet): "closed circuit" with "water circulating in the system" + a rainwater tank "for emergency cooling of installations" [TIER D - Onet]; "Myth #2": "it will not be used for cooling" [TIER A - post]; "Myth #3": hybrid dry loop with a coolant [TIER A - post]; investor meeting in Emilin (1 September 2026): "immersive cooling" like in transformers — orally, without a document [TIER D - meeting account; UNVERIFIED - recording pending]. The descriptions can only be reconciled by reading "water = working medium in a sealed loop" (that is how Microsoft's waterless design works) — but then the rainwater tank "for emergency cooling" is left unexplained.
- **Demand:** written indication of the binding installation description, the definition of the coolant (water/water-glycol/immersion dielectric), the rainwater tank's role and capacity (m^3) with its use scenario — and a reference to the engineering document that settles it (expanded demands: Q82).
- **Why it matters:** the office and the investor cannot run four parallel descriptions of the same installation during an ongoing planning procedure. The answer is one sentence long — resistance to giving it will be eloquent.

Q46. How much water does winter humidification consume — and how does it sum with the 50 m^3/day promise?

- **Basis:** in winter the supply air requires humidification — process water even in "waterless" designs (Q36); "Myth #2" promised ~50 m³/day "mainly" for sanitary needs, but the categories do not close in a balance; no site water balance exists [TIER A - posts; TIER C - Microsoft/Meta].
- **Demand:** the design water balance of the site for annual-average and winter days (humidification + sanitary + fire + loop make-up), distinguishing withdrawal from consumption.
- **Why it matters:** without a balance, "50 m³" and "zero for cooling" remain decoration — the sum of all streams is the only number that can be written into MPZP §20 (Q32).

Theme 11 — The "Myth #4" post (August 2026) — electricity: connection conditions, prices and the post-coal balance

The fourth post in the series ("together with the investor") answers the charge that residents may "simply run out of electricity" or that energy prices will rise: the target connection capacity is 500 MW, for which "agreement" was obtained from Polskie Sieci Elektroenergetyczne S.A. (PSE), which "analysed in detail and confirmed" that the connection "will not threaten the security of the whole system or the ability to supply other consumers"; the scale argument is Elektrownia Bełchatów with "ten times greater" capacity, and household electricity prices are not to rise because the price "does not depend on the consumption of a single consumer" [TIER A - post]. Independent verification (full analysis: «Belchatow_Mit4_PL.pdf», Polish; main report §2.4.11) found among other things: formally PSE does not issue an "agreement" but **determines connection conditions** following a mandatory system-impact study (art. 7 ust. 3a and 8e of the Energy Law; exceptions only up to ≤5 MW) — a non-published document, by default protected as a business secret; the words "PSE", "connection capacity" and any MW figure **appear not once** in the MPZP resolution or the environmental forecast (full-text verification); the comparison with the power plant (5 096.7 MW) is numerically consistent but omits that its units leave the system in 2030–2036 — should the HDC's full capacity arrive after 2030, its start-up would coincide with the retirement window (the HDC start-up schedule is unpublished; the timing overlap is a projection, not an established fact); 500 MW is ~1.8% of the record KSE peak demand of 27.6 GW (9 Jan 2026) and ~4.5% of the 2025 average peak reserve [COMPUTED - PSE data]; and the no-price-impact claim is too strong — capacity-market costs (~PLN 10 bn in 2026 — an industry estimate) and network-reinforcement costs are socialised through tariffs, while the official monitor of the PJM market identified data centres as the "primary reason" for the 82% rise in capacity-auction revenues (USD 7.3 bn in a single auction) [TIER B]. The post's honest half: power-supply rationing levels in a deficit apply only to customers with connected power ≥300 kW — households are protected, and the HDC is curtailed first.

Q47. The "PSE agreement" — full 500 MW at once or in stages? (to the Wójt and the investor)

- **Basis:** the "Myth #4" post (August 2026): "Docelowa moc przyłączeniowa [...] to 500 MW. Na taką moc uzyskano zgodę od PSE" ("the target connection capacity is 500 MW; agreement to that capacity was obtained from PSE") [TIER A - post]; formally PSE does not issue an "agreement" but **determines connection conditions** on application (art. 7 ust. 3a PE; for groups I–II a 150-day deadline — art. 7 ust. 8g item 5) [TIER C - Energy Law, consolidated Dz.U. 2026 poz. 43]; "PSE", "connection capacity" and any MW figure appear not once in the MPZP resolution or the forecast (full-text verification).

ation) [TIER A - BIP]; earlier communication spoke of "500 MW of connection conditions" confirmed by the Wójt (Feb 2026) — a technical-conditions document, not an energy supply contract (Q5); the declared ~1 GW growth path with a summer campus peak of ~630–710 MW (Q43) and the GPZ question (Q15) remain open.

- **Demand:** written information on: (a) whether the issued connection conditions cover the **full 500 MW at once or in stages** (e.g. 100 MW → 500 MW); (b) **which stage and what capacity the August 2026 post confirms**; (c) disclosure of the capacity scope covered by the PSE decision (issue number and date, capacity, voltage, supply point / main supply point).
- **Why it matters:** "target" connection capacity does not mean "obtained": conditions for 100 MW to start and conditions for 500 MW differ five-fold for the grid balance and reinforcements. A figure that appears in no planning document lives only on Facebook, which is why we demand its scope in writing.

Q48. The KSE system-impact study and the network-cost split — an FOI request to PSE (ready-to-file form: Template B2)

- **Basis:** a system-impact study is **mandatory** for direct connections above 1 kV (art. 7 ust. 8e PE; exceptions only up to ≤5 MW) — at 500 MW it was certainly prepared [TIER C - PE]; the document is not published, and publication is constrained by business-secret protection (art. 5 of the public-information act) [TIER C]; the connection fee for the transmission network is ¼ of actual outlays — the rest of the reinforcement costs is borne by the operator, refinanced through tariffs, i.e. by all consumers (art. 7 ust. 8 item 1 PE) [TIER C].
- **Demand:** filing (ready-to-send form — Template B2 below) of a public-information / environmental-information request to PSE for: (a) the **KSE system-impact study** for the Bełchatów HDC; (b) the **scope of network investments** conditioned by the connection; (c) the **cost split** of reinforcements (investor's own contribution vs costs refinanced through tariffs).
- **Why it matters:** since the post invokes the PSE analysis as a guarantee of system security, residents may ask for its content. **Caveat:** PSE may refuse, citing business secrecy — then the refusal itself and its scope are information (what exactly the secret covers); the appeal path is indicated in the template (skarga to the WSA; where the entity disputes organ status — the ordinary-court route, sąd okręgowy).

Q49. Flexibility commitments — is the HDC subject to power-supply rationing and load reductions? (to the investor and the Wójt)

- **Basis:** power-supply rationing levels (11–20) apply **only to customers with connected power ≥300 kW** — "most homes and flats have connected power of at most a dozen or so kilowatts" [TIER A - PSE "Stopnie zasilania"]; the Regulation of the Council of Ministers of 8 Nov 2021 (Dz.U. 2021 poz. 2209, § 6) exempts from restrictions, among others, hospitals, media, transport and **critical infrastructure** [TIER A]; a flexibility-services market exists and is used by data centres — since 2022 Microsoft Dublin feeds UPS-battery power back into the grid on EirGrid's signal (DS3 market) [TIER C - Microsoft; TIER B - WEF]; the official PJM monitor recommends that new data centres bring their own generation/flexibility instead of loading existing supply [TIER B].

- **Demand:** a statement whether the HDC will undertake **flexibility commitments** (demand-response / load-reduction contracts at the operator's call, demand-side participation in the capacity market), and whether the investor **has applied or intends to apply for an exemption** from rationing levels (e.g. as critical infrastructure).
- **Why it matters:** the post's reassuring comparison ("residents will not run out of electricity") rests entirely on the HDC, as a ≥ 300 kW customer, being curtailed **first**. An exemption from the exclusion list removes that single safeguard — and voluntary flexibility commitments are a real, working EU mechanism we ask about before permits, not after.

Q50. A price safeguard for residents — a voluntary host-community agreement (to the Wójt and the Gmina Council)

- **Basis:** network costs and the capacity-market cost are socialised through tariffs approved by the President of URE (2026 capacity-market cost: ~PLN 10 bn — an industry estimate; household capacity charge 4.29–24.05 PLN/month by usage band) [TIER A - URE; TIER B - energetyka24]; in PJM, the 82% rise in capacity-auction revenues (USD 7.3 bn in one auction) was attributed by the market monitor to data centres as the "primary reason", with the costs ultimately borne by all consumers [TIER B]; an MPZP can bind infrastructure parameters (like a water-draw limit, Q32) but **cannot financially oblige the investor** beyond the planning fee — voluntary host-community agreements (investor–community agreements, precedents: Ireland, Virginia) are the standard complement.
- **Demand:** that the Wójt/Gmina Council open talks with the investor on a **voluntary host-community agreement**, covering e.g.: covering any rise in network/capacity charges for the gmina's residents and financing local network upgrades — as a civil-law commitment of the investor, **not an MPZP provision**.
- **Why it matters:** "no impact on prices" is a thesis hard to sustain in the light of the PJM evidence — instead of disputing the thesis, one can secure a compensation mechanism. A voluntary agreement can achieve more than a local plan; it must be negotiated at the latest while the investor still needs community and administrative consent.

Q51. The KSE balance 2030–2036 — what capacity will serve 500 MW of HDC after the units retire? (to PSE and the President of URE)

- **Basis:** TPST: Elektrownia Bełchatów units are retired **from 2030 to 2036** (last unit 2036) [TIER B - CIRE/TPST]; KSE: record demand 27.6 GW net (9 Jan 2026), 2025 maximum: 27 550 MW, 2025 average peak reserve: 11 131 MW [TIER A - PSE, KSE operation report 2025]; 500 MW = ~1.8% of the record peak and **~4.5% of the 2025 average peak reserve** [COMPUTED - from PSE data]; the HDC's start-up may coincide with the beginning of the phase-out (the HDC start-up schedule is unpublished — the timing overlap is a projection, not an established fact) — the question of a year-by-year campus supply plan was already put in Q13.
- **Demand:** a PSE and President-of-URE position **before 28 Aug 2026:** what dispatchable capacity will serve 500 MW of new baseload at the HDC's start-up; what the KSE balance looks like in the 2030–2036 horizon (reserves against the parallel retirement of units and the growth of data centres — per market forecasts (JLL, PMR), Polish data-centre power demand may reach ~1.2 GW in 2030–2034, and the draft PSE Transmission Network Development Plan (PRSP) of April 2026 assumes 3.1 GW in 2036 and 5.0 GW in 2040 — 17.4 / 29.4 TWh per year (2036/2040) [TIER A - PSE PRSP]).

- **Why it matters:** the "power plant 10× larger" comparison omits that this capacity **leaves the system in the horizon into which the HDC's planned full capacity falls**. Balance responsibility lies with the operator and the regulator, not the gmina — hence we address PSE/URE, and will submit the reply to the uwagi and the consultation record.

Theme 12 — The "Myth #5" post (August 2026) — noise: screens, enclosures and the "wall of forest" (Q52–Q57)

The fifth post in the series ("together with the investor") answers the charge that a data centre "means enormous noise that will make life impossible for residents of the surrounding villages": cooling systems and generators are to receive "state-of-the-art acoustic enclosures and silencers", "extensive acoustic screens" will be built, and the campus is to be surrounded by a "wall" of forest and greenery as a "natural barrier" — because "acoustic analyses show that the noise level will not exceed the norms binding for residential areas" [TIER A - post]. Independent verification (full analysis: «Belchatow_Mit5_PL.pdf», Polish; main report §2.4.12) found among other things: the listed measures are industry standard, but the conclusion "will not exceed the norms" cannot be derived from them — catalogue enclosures of megawatt-class gensets top out at 75–85 dBA at 7 m; 3–8 m screens give ~0 dB insertion loss for sources on the roofs of halls up to 30 m (§ 28(3)(g)), while an effective screen would have to be 19–29 m tall and at least 2.4 km long [COMPUTED - ISO 9613-2/FHWA]; the "wall of forest" attenuates a few decibels and mainly high tones, which cooler noise (35–200 Hz) is not [TIER B - FHWA]; an oak takes 60–100+ years to reach 20 m [TIER B - forestry yield tables], and building rules require a 12–40 m building-to-forest setback depending on fire load and construction [TIER A - WT § 271(8)]; a fleet of ~290–550+ coolers of the 64–73 dB(A) at 10 m class («Belchatow_Mit3_PL», Polish) is +24.8 dB over a single unit at 300 units, and the night limit for Domiechowice and Emilin is 50/40 dB LAeqD/LAeqN, with the night indicator computed for the worst hour of the night [TIER A - Dz.U. t.j. 2014 poz. 112]; and the "acoustic analyses" the post invokes are unpublished — the environmental forecast contains not a single dB value (§ 11.10/§ 11.11.B) and MPZP § 11(4) sets no number [TIER A - BIP]. The honest half of the post: for the first time the series names concrete mitigation measures (enclosures, silencers, screens, greenery) instead of superlatives alone — what is missing is precisely the numbers that turn measures into a result.

Q52. Which acoustic analyses, who prepared them, and when will they be public? (to the Wójt and the investor)

- **Basis:** the "Myth #5" post (August 2026): "Z analiz akustycznych wynika, że poziom hałasu nie przekroczy norm, obowiązujących dla terenów mieszkaniowych" ("acoustic analyses show the noise level will not exceed the norms binding for residential areas") [TIER A - post]; the environmental forecast contains not a single dB value, measurement or acoustic study (§ 11.10/§ 11.11.B), and the MPZP's only noise rule (§ 11(4)) defers to "environmental quality standards" without a number [TIER A - BIP].
- **Demand:** written information on: (a) which document the phrase "acoustic analyses show" refers to (report/study/expert opinion); (b) author, date and assumptions (inventory of sources, heights, propagation model); (c) publication date and form; (d) whether the analysis covers the ~1 GW target phase, not only 500 MW.
- **Why it matters:** a result invoked without a document cannot be verified, while residents are consulting a plan in which noise appears in no number — the dialogue is happening only on Facebook.

Q53. An inventory of noise sources and screen heights — with computed insertion loss

- **Basis:** the post promises "extensive acoustic screens" without heights, lengths or locations; halls up to 30 m (§ 28(3)(g)) mean that for roof-level sources 3–8 m screens give ~0 dB insertion loss, and an effective screen would have to be 19–29 m tall and at least 2.4 km long [COMPUTED - ISO 9613-2/FHWA]; the environmental forecast contains no acoustic analysis [TIER A - BIP].
- **Demand:** an inventory of noise sources (equipment, installation heights, source levels dB(A) and spectra) together with screen parameters and the computed insertion loss for the nearest buildings, split into the "sources on roofs" and "sources at grade" variants — separately for 500 MW and for ~1 GW.
- **Why it matters:** between the promise of screens and their effectiveness stands one physical quantity: breaking the line of sight. Without an inventory there is no way to know whether the screens attenuate anything.

Q54. The "wall of forest" — land, species, planting age and the conflict with fire-safety rules

- **Basis:** the post: the campus "surrounded by a »wall« of forest and greenery" as a "natural barrier" [TIER A - post]; FHWA: vegetation planted "for psychological relief", 30 m of dense forest $\approx$ 5 dB [TIER B]; from existing forest land (Ls) the halls must stand 12–40 m away depending on fire-load density and construction — 12/22.5/30 m for a hall of non-fire-spreading elements, 16/30/40 m where its own roof or forest-facing wall spreads fire (technical conditions § 271(8)) [TIER A], while a belt planted on campus land is not "forest" within the meaning of the provision; an oak takes 60–100+ years to reach 20 m, a pine ~40–70 years [TIER B - forestry]; the ~50 ha campus adjoins State Forest land.
- **Demand:** a planting plan: (a) on whose land the belt arises and who maintains it; (b) species and size of the starting stock (saplings or ready trees); (c) belt width and density (the "cannot be seen through" condition of ISO 9613-2); (d) a growth schedule with declared dB reduction in years 1, 5, 10 and 30; (e) hall setbacks from existing forest land (§ 271(8): 12–40 m depending on fire load and construction) and the status of the planted belt — on forest land or campus land, and what follows for its width.
- **Why it matters:** if the "wall" is to attenuate, it must be dense, wide and close to the source — three conditions each item asks about; the statutory forest setback pushes in the opposite direction.

Q55. The cooler fleet — count, source levels, tonality and the 40 dB night contour

- **Basis:** rejecting 500 MW of heat waterlessly requires ~290–550+ coolers of the 64–73 dB(A) at 10 m class («Belchatow_Mit3_PL», Polish; [COMPUTED] — manufacturer catalogues); 300 units = +24.8 dB over one; the night limit for Domiechowice and Emilin is 40 dB LAeqN (annex item 2 letter a [TIER A - Dz.U. t.j. 2014 poz. 112]); simplified 40 dB contour: 2.7–10.5 km [COMPUTED - free field]; tonality raises the rating by 3–6 dB (ISO 1996-1).
- **Demand:** (a) the planned number of coolers and their placement (roofs or grade); (b) source levels dB(A) and octave spectra of the units; (c) a tonality analysis (blade-pass frequencies); (d) an ISO 9613-2 propagation model to the nearest residential buildings with a 40 dB isophone contour for the worst hour of a summer night — for 500 MW and for ~1 GW.
- **Why it matters:** this is the only dataset from which the sentence "the noise level will not exceed the norms" mathematically follows (or does not).

Q56. Standby generators — count, enclosures and the testing schedule (at night?)

- **Basis:** the backup fleet for 500 MW of IT ($500 \text{ MW} \times \text{PUE } 1.1\text{--}1.3 \times N+1$ reserve $1.2\text{--}1.4 \div$ unit capacity; read as connection power instead — some 185–280 units) is on the order of 200–360 gensets of the 2.5–3.25 MW class [COMPUTED - anchors: Amazon Manassas $93 \times 2.5 \text{ MW}$; the NoVA campus 245 units/ $\sim 1,083 \text{ MW}$, i.e. an average of $\sim 4.4 \text{ MW}$ per unit]; the catalogue sound-attenuated enclosure tops out at 75–85 dBA at 7 m [TIER B - Kohler]; the US NFPA 110 standard (industry practice, not a Polish requirement) requires monthly 30-minute tests at $\geq 30\%$ load (+ conditionally annual 1.5 h at 50%/75% and a 36-month test), which at a fleet of ~ 300 units gives $\sim 3,600$ starts a year, i.e. on average nearly 10 a day [COMPUTED - calendar arithmetic]; Q40 already demands capacity and fuel tanks — this question concerns noise only and does not duplicate Q40.
- **Demand:** (a) the number and location of the generators — separately for 500 MW and for $\sim 1 \text{ GW}$; (b) the dB(A) level of the best-available enclosure class at full load; (c) the test schedule: time windows (day/night), noise limit during tests, rules for "unplanned" starts and any operation in response to grid signals.
- **Why it matters:** test noise is cyclical and predictable, i.e. regulable — provided the gmina and the investor set the time windows before the first unit is built.

Q57. Writing 50/40 dB into the plan and a baseline measurement — closing Q9 after the "analyses" promise

- **Basis:** the post promises that "the noise level will not exceed the norms binding for residential areas" — for Domiechowice and Emilin that is 50 dB LAeqD / 40 dB LAeqN (item 2 letter a) [TIER A - Dz.U. t.j. 2014 poz. 112]; MPZP § 11(4) sets no number, so the declaration has no legal addressee; WHO recommends 40 dB at night as a health target [TIER C]; no baseline measurement of the ambient was made [TIER A - prognoza].
- **Demand:** an entry in § 11 of the MPZP of a **50 dB LAeqD / 40 dB LAeqN limit at the boundary of the site** for industrial sources, plus an obligation of an accredited baseline measurement (PN-ISO 9613-2) before construction begins — the exact closure of the Q9 demand, updated with the post's promise of "acoustic analyses".
- **Why it matters:** if the analysis has already demonstrated compliance, as the post says, writing its result into the plan can cost nothing. A refusal to write the limit into the plan says more than the post itself.

Theme 13 — The "Myth #6" post (August 2026) — forests: farmland, self-seeded growth and the inventory (Q58–Q63)

The sixth post in the series ("together with the investor") answers the charge that "hectares of forest must be cut for the campus to be built": the area is land "of agricultural character both in the past and at present", "not forest land"; parts of the plots carry "natural self-seeded trees and shrubs" to be "covered by a detailed dendrological inventory", with all further actions "in accordance with the law and the decisions of the competent authorities" [TIER A - post]. Independent verification (full analysis: «Belchatow_Mit6_PL.pdf», Polish; main report §2.4.13) found among other things: the core of the answer is confirmed as regards the present state of the land — the resolution describes the zone as uncultivated agricultural land, the forecast sees only segetal and ruderal vegetation on farmed or fallow land

(soils IV–VI, no classes I–III), and the orthophoto shows no closed tree stand [TIER A - BIP]; self-seeded growth has its own agricultural register class (Lzr) and does not meet the statutory definition of forest [TIER A - Forests Act art. 3; Land Register § 9]; but the "in the past" claim has no support in any document of the package, the words "self-seeded" and "dendrological inventory" appear in none of them, and a "detailed inventory" is not a statutory institution — legally required is only the enumeration of specimens above the removal-permit thresholds (trees with trunk girth at 5 cm up to 80/65/50 cm depending on species, shrub clusters up to 25 m²), while below the thresholds removal needs no permit and leaves no record [TIER A - Nature Conservation Act art. 83b/83f]; for mineral soils of classes IV–VI exclusion from agricultural production requires no decision or fee [TIER A - art. 11]; and the campus borders State Forest, with a building-restriction zone drawn 12 m from the forest boundary — the lowest rung of WT § 271(8) [TIER A - BIP; WT]. The honest half: the series' first answer whose core — as to the present state — survives a full reading of the planning documents. What is missing: the inventory's numbers, deadline and addressee — and the connection-corridor map, the most probable seed of the forest rumour.

Q58. Dendrological inventory — publication before the plan is adopted (scope, fate of the trees, contractor, deadline)

- **Basis:** the post: self-seeded growth "will be covered by a detailed dendrological inventory" [TIER A - post]; a "dendrological inventory" appears neither in the Nature Conservation Act nor in any planning document as a mandatory deliverable — legally unavoidable is only the enumeration of specimens covered by removal-permit applications (species, trunk girth at 130 cm, area, location — art. 83b); below the thresholds (trees up to 80/65/50 cm at 5 cm, shrubs up to 25 m²) removal needs no permit and leaves no trace [TIER A - art. 83/83b/83f]; fees and replacement plantings — art. 84 ust. 3–7 [TIER A].
- **Demand:** publication of the dendrological inventory's results before the plan is adopted: a list of trees and shrubs (species, girths, condition), the fate of each specimen (removal / transplanting / compensatory planting), contractor and deadline; for replacement plantings — their location, species and schedule.
- **Why it matters:** the inventory is the only document that turns the adjective "detailed" into a checkable dataset; once the plan is adopted and permits issued, residents lose any influence over the scope and fate of the trees.

Q59. Land-register extracts for the entire site — use classes (R/Lzr/Ls), soil classes and origin

- **Basis:** the post: the land is "of agricultural character both in the past and at present [...] not forest land" [TIER A - post]; the argument rests on the register state — self-seeded growth has its own agricultural class there (Lzr, "land tree- and shrub-covered within agricultural land"), and the formal "agricultural or forest" is settled by the Ls entry [TIER A - Land Register § 9]; the resolution confirms agricultural land and the absence of protected forest [TIER A - BIP]; the register is maintained by the starosta (Geodetic and Cartographic Law); the UG inter-session information for 10.06–10.08.2026 lists 71 cadastral plots covered by the DŚU application [TIER A - UG inter-session information], but the use-class and soil-class data for those plots remain non-public — the demand remains live.
- **Demand:** land-and-building-register extracts for all plots of the site: list of plots, land-use classes (R / Lzr / Ls), bonitation classes and soil origin (mineral / organic) — together with the register map with the zone boundary marked.

- **Why it matters:** the office's declaration summarizes the register state; the plot-and-use list contains no personal data, and the wójt, as the organ running the consultation, can obtain the extracts from the starosta and publish them as part of it — we ask for that before anyone must resort to individual requests.

Q60. "In the past" — the historical basis of the claim about the land's character

- **Basis:** full-text check of the package (resolution + forecast + annex): no sentence documents the historical designation of the land — the only indirect trace is "existing agricultural use" (forecast, p. 17), which proves nothing about the land's earlier character [TIER A - BIP]; the past determines whether the self-seeded growth is an early stage of succession (forest returning) or transient scrubbing-over of fallow — which changes its ecological significance.
- **Demand:** identification of the concrete basis of the "in the past" claim — historical maps, archival registers, a study — or a withdrawal of that part of the sentence.
- **Why it matters:** after six posts in the series, every claim without a document reads through the prism of the "number without a source" pattern ("Myth #2"); a request for one map is a minimum of rigour.

Q61. A list of the project's foreseen administrative decisions, with a schedule

- **Basis:** the post: "all further actions will be conducted in accordance with the law and the decisions of the competent authorities" [TIER A - post]; for mineral soils of classes IV–VI, exclusion from agricultural production requires no decision or fee (closed list, art. 11 ust. 1 — the position the resolution's own justification invokes) [TIER A]; the real decisions (environmental decision, building permits, tree-removal permits) lie ahead of the investor, not in the plan; the DŚU proceeding is formally open already (application of 22.12.2025) and suspended pending submission of the OOS report [TIER A - UG inter-session information], and the decision schedule remains unknown.
- **Demand:** a list of the administrative decisions the investor foresees for the whole project (environmental decision, any exclusions of land from production, building permits, art. 83/83f permits), with the competent authorities and an indicative schedule.
- **Why it matters:** "decisions of the competent authorities" without a list and a calendar is a promise without content; residents want to know when and where they can participate.

Q62. The power-connection corridor (GPZ Kurnos) — route map and land crossed

- **Basis:** the connection route has not been published in any document of the planning package [TIER A - BIP, full-text check]; cable and overhead lines are in practice also routed through forests; the "hectares of forest" charge most likely originates in the unknown route, not the site [UNVERIFIED - route unpublished]; Q15 already asks about the GPZ location — this question concerns the corridor and its effects.
- **Demand:** a map of the connection corridor (route variants to GPZ Kurnos / the Elektrownia Bełchatów switchyard) broken down by forest, agricultural and built-up land, with the line type (overhead or cable), the land-interest mode (transmission easement / purchase) and the decision schedule and track (PSE / wójt / RDOŚ — including whether the route is subject to a separate environmental assessment, and, for State Forest land, to a taking consent).

- **Why it matters:** this is the most probable place the project could genuinely touch forest — disclosing the route kills the rumour at its source or confirms it; either way, residents gain. System-level matters (grid-impact study, network reinforcements) sit with PSE — ready FOI template: Template B2 at Q48.

Q63. The 12 m forest-boundary zone — the fire load it assumes for the halls

- **Basis:** the MPZP drawing runs the building-restriction zone 12 m from the forest boundary (§ 13) [TIER A - BIP]; under WT § 271(8) the building-to-forest setback is 12 m at a fire-zone load of $Q \leq 1000 \text{ MJ/m}^2$, 22.5 m at $Q 1000\text{--}4000$ and 30 m above (for halls of non-fire-spreading elements; 16/30/40 m where fire-spreading) [TIER A - WT, verified 27.08.2026]; the fire load of data halls (fuel stores, UPS, equipment) is not settled at plan stage.
- **Demand:** confirmation of the design fire load of the halls' fire zones (Q in MJ/m^2) on which the 12-metre zone was based — or a correction of the zone in the plan to 22.5/30 m if the design Q exceeds 1000 MJ/m^2 ; if Q cannot be settled at plan stage, a conditional mechanism in § 13 (building within the 12 m zone allowed only at fire-zone $Q \leq 1000 \text{ MJ/m}^2$, verified at building-permit stage).
- **Why it matters:** a zone drawn at the table's lowest rung is a hidden future cost: it will either constrain the hall layout or be challenged at building-permit stage; better settled in consultations — and the conditional mechanism also covers the case where the halls' fire load is not yet known.

Theme 14 — The "Myth #7" post (August 2026) — land, utilities and roads: who really pays (Q64–Q69)

The seventh post in the series (produced "together with the investor") answers the charge that "the gmina will buy the land from private owners, service the plots and build the roads with taxpayers' money" while the campus moves in "ready-made": the land is private, "a large part of these areas has already been purchased by the investor", "the gmina bears no costs in this connection", and "the investor will pay for all activities related to preparing the site — from designs, through servicing the plots, road construction etc." [TIER A - post]. Independent verification (full analysis: «Belchatow_Mit7_PL.pdf», Polish; main report §2.4.14) established among other things: the core is true — the gmina is not a party to the land transactions (the buyer is BLUENEXT ENERGY, not the gmina budget) and the land is private [TIER A - BIP; TIER D - offer/press]; however, the costs of the planning procedure fall on the gmina budget by operation of art. 21(1) of the Planning Act (the exceptions concern only public-purpose investments — and a private data campus is not in the catalogue of art. 6 of the Real-Estate Management Act) [TIER A]; the word "purchased" is unfalsifiable — the press (2.04.2026) described preliminary agreements with ownership transfer only after the planning procedure, and a preliminary agreement does not transfer ownership (art. 389 of the Civil Code; a notarial deed does — art. 158) [TIER A - Civil Code; TIER D - press]; §27 of the draft plan sets the planning fee on the value increase at 30% (the statutory maximum) — and with ownership transfer due after the plan's adoption, its burden will fall on the selling residents [TIER A - BIP §27]; the plan designates public roads (1KDR, 26.8–44 m along national road dk74, plus three KDZ), whose maintenance after handover will burden the municipal road manager, i.e. the wójt [TIER A - BIP; Public Roads Act art. 19]; and Annex 2 to the draft resolution provides that the

water/sewage networks will be financed "from the water utility's own funds [...] or based on the gmina budget" (electricity and gas — operators, under the Energy Law): the investor appears nowhere in the plan's financial provisions [TIER A - BIP, Annex 2]. For the first time the post answers a charge absent from our question card — the six questions below concern what the answer does not say.

Q64. List of the plan-area plots with ownership status — purchased / preliminary agreements / remaining

- **Basis:** post: "a large part of these areas has already been purchased by the investor" [TIER A - post]; local press (2.04.2026): all plots "in the investor's hands" under preliminary agreements, "ownership to be transferred after the planning procedures conclude" [TIER D - ebelchatow.pl]; a preliminary agreement does not transfer ownership — a notarial deed does (Civil Code arts. 389, 158) [TIER A]; the gmina's inter-session information lists 71 cadastral plots in the DŚU application without ownership status [TIER A]; land-register viewing is public (ekw.ms.gov.pl) but the register numbers cannot be identified without a plot list.
- **Demand:** a list of the plan-area plots — purchased (with date and form of title transfer) / under preliminary agreements / remaining — with a cadastral map and the plan boundary marked (the 71 DŚU plots as reference).
- **Justification:** "a large part purchased" is a claim about someone else's property; a plot list (numbers, no owners) contains no personal data and can be published during consultations — it closes the land-purchase question and the series-credibility question in one move.

Q65. Planning-procedure costs from the gmina budget — amounts and any investor cost-sharing agreement

- **Basis:** art. 21(1) of the Planning Act (Dz.U. 2026 poz. 538 t.j.): plan-preparation costs fall on the gmina budget; the art. 21(2) exceptions concern only public-purpose investments (Planning Act art. 2(5) read with Real-Estate Management Act art. 6) — a private data campus does not meet the definition [TIER A]; the plan was initiated by Council Resolution no. XXI/169/2025 of 25.09.2025 [TIER A - eSesja]; the OOS forecast (author: Łukasz Beń), notices and consultations were commissioned by the gmina; the resolution's justification also lists incomes (planning fee §27, property tax) [TIER A - BIP]; investor cost-sharing for private projects is possible only by contract [TIER C - practice].
- **Demand:** the amount spent from the gmina budget on the planning procedure since 25.09.2025 (OOS forecast, notices, consultations, design duty desk) — alongside projected incomes (planning fee, property tax) — and written information whether a cost-sharing agreement with the investor was concluded or planned; if not, why not.
- **Justification:** "the gmina bears no costs" is true of the land purchase, but "all activities related to preparing the site" includes the planning process which the gmina pays for by statute — the balance is open, not zero; we want it in numbers.

Q66. The plan's public roads (1KDR, 1KDZ, 2KDZ, 3KDZ) — map, land acquisition, construction, category, management

- **Basis:** the plan designates a principal accelerated-traffic road area 1KDR (26.8–44 m; § 29) and three collective road areas (§ 16, § 30) [TIER A - BIP]; maintaining public roads is the road manager's task — for municipal roads, the wójt (art. 19(2)(4) of the Public Roads Act) [TIER A]; after the plan's adoption, sales of land designated for public purposes trigger the gmina's pre-emption right (Real-

Estate Management Act art. 109(1)(3); excluded for sales for national-road purposes — art. 109(3)(6)), and an owner whose use of the land the plan has materially restricted may demand buy-out (Planning Act art. 36(1)(2)) [TIER A]; the 1KDR strip runs along national road dk74 — interpretatively it looks like a widening reserve (GDDKiA) [UNVERIFIED - inference from the plan drawing].

- **Demand:** a map of the plan's public roads against dk74 and existing roads, answering: who acquires the land within the road corridors and in what mode, who builds and finances them, what road category they will receive (who assigns it and when), who takes over management and when — and whether the 1KDR strip is a dk74 widening reserve (GDDKiA's position).
- **Justification:** road construction is a one-off investor cost; public-road maintenance is the manager's perpetual cost — and a strip up to 44 m wide along a national road is potentially state-taxpayer money, not only municipal.

Q67. Estimated annual maintenance cost of the public roads and greenery the gmina will take over — and the position on cost-sharing

- **Basis:** once public roads are handed over to municipal management, their maintenance (snow removal, repairs, lighting, arranged greenery) becomes the gmina's own task [TIER A - Public Roads Act arts. 19–20]; the gmina has a statutory recovery tool for value increases — the adjacency fee (Real-Estate Management Act arts. 145–146: wójt's decision after connection conditions are created, where publicly funded infrastructure raised the property's value; max. 50% of the increase) [TIER A].
- **Demand:** an estimated annual maintenance cost for the public roads and arranged greenery the gmina will receive on handover, with assumptions (lengths, classes, standard) — and the gmina's position on negotiating investor participation in maintenance costs or an adjacency fee.
- **Justification:** "ready-made" has silent payers on both sides of the ledger — the gmina (road maintenance) and sellers (the §27 planning fee); both costs can be estimated today, before the plan reaches the Council.

Q68. The contradiction: the post's "the investor will pay for all activities" vs Annex 2 — who finances the public networks, and whether public funds were applied for

- **Basis:** Annex 2 to the draft resolution (the determination on implementation and financing of technical-infrastructure investments): water and sewage network construction will be financed "from the water utility's own funds" (per multi-annual development plans) "or based on the gmina budget", electricity and gas networks — under the Energy Law (art. 7(4)–(5)); the resolution's justification expressly lists the water/sewage network expenditures among the plan's financial consequences; the investor appears nowhere in the financial provisions [TIER A - BIP]; §§ 20–24 set the target network service (water ϕ 150, sewage ϕ 160, gas ϕ 63) [TIER A]; the utility's "own funds" in practice return via tariffs approved by the wójt — i.e. charged to all customers [TIER C - practice]; whether public co-financing (FEL — EU Funds for Łódzkie, FEnIKS, KPO, ZIT instruments) was applied for is unknown [UNVERIFIED].
- **Demand:** a statement whether the investor will contractually take over the costs of bringing the public networks (water/sewage/gas) to the zone boundary — with the agreement published — and whether the gmina or the investor filed applications for public co-financing of this infrastructure and the roads (which programmes, what amount, what status).

- **Justification:** the Facebook promise and the resolution's determination tell two different stories; the only test is an agreement that changes Annex 2 in practice — or an admission that the promise outran the document.

Q69. The §27 planning fee (30% of value increase) — notifying sellers, and a written investor commitment with security

- **Basis:** §27 of the draft plan sets the one-off fee on the property-value increase at 30% — the statutory maximum (Planning Act art. 36(4) read with art. 37(3)–(4); collected by the wójt from the seller on disposal within 5 years of the plan entering into force) [TIER A - BIP §27]; the resolution's justification records the fee as gmina income [TIER A]; since ownership is to pass to BLUENEXT ENERGY after the plan's adoption (press, 2.04.2026 [TIER D]), the fee's burden will fall on the selling residents; the promise that "the investor will pay for all activities" has no contractual form — the series' pattern of soft commitments (dendrological inventory, acoustic enclosures, 50 m³/day — main report §2.4.12–§2.4.13) [TIER A - post; UNVERIFIED - no document].
- **Demand:** (i) notification of landowners selling within the 5-year window that §27 sets the planning fee at 30% of the value increase — with a worked numeric example; (ii) a written investor commitment to cover site-preparation costs (designs, plot servicing, roads) with a schedule and performance security (escrow / bank guarantee / surety), covering also insolvency of the project vehicle or abandonment of the project (cf. Q6 — demolition escrow).
- **Justification:** the cost of the procedure cannot be a surprise after the contract is signed, and a social-media promise is not a contract — after seven episodes of the series we are asking for form, not slogans.

Theme 15 — The "Myth #8" post (August 2026) — employment: how many jobs, whose hands, whose PIT (Q70–Q75)

The eighth post in the series (produced "together with the investor") answers the charge that "such projects don't need many hands to work; only a handful of highly qualified specialists will find employment here" — and is the first in the series to publish numbers: 200–800 construction workers "depending on the stage the investment has reached", "approx. 250 permanent jobs" once operational (IT engineers, cybersecurity experts, technicians, infrastructure-maintenance specialists, security), and, around the facility, "other businesses will also develop" (service, logistics, construction, transport, gastronomy) [TIER A - post]. Independent verification (full analysis: «Belchatow_Mit8_PL.pdf», Polish; main report §2.4.15) established among other things: the order of magnitude of 250 is consistent with international benchmarks — 0.25–0.5 jobs/MW at 500 MW–1 GW; ~50 jobs per typical building (about half of them contractors) per Virginia's legislative audit commission; Meta Richland Parish 500–1,000 jobs at >2 GW; Google Council Bluffs 250 direct employees with ~900 "on site" including suppliers [TIER A/B] — but the numbers appear in no BIP document: the MPZP resolution contains not a single employment provision (full-text check), the OŚ forecast mentions "the creation of new jobs" only qualitatively (§11.10, §11.11.B), and §11.15 expressly treats "the number of workers" as an unknown variable [TIER A - BIP]; earlier gmina statements gave higher numbers — "several thousand" construction workers (April 2026) and "around 400" permanent jobs plus demand "in the thousands" (May 2026) [TIER D - local press] — the communicated jobs package shrank within a few months (April–August 2026) by ~40% (permanent jobs), with construction figures down several-fold at least [COMPUTED]; construction crews are largely

itinerant specialists from a specialized market ("out-of-town workers who leave when the construction is over"), and hyperscalers "do not hire top specialists on site, but fly them in when something breaks" [TIER B]; the PIT share attaches to the taxpayer's place of residence (Act of 1 Oct 2024 on local-government revenues, art. 8: the gmina receives 7.0% of PIT income of residents and 1.6% of CIT income of companies seated there) — "250 jobs" does not mean 250 PIT revenues for the gmina [TIER A]; the "other businesses will develop" multiplier carries not one number, while independent research indicates +100–200 jobs per county and unchanged wages [TIER A/edu]; the 250 figure is also in tension with "Myth #2": at 60 l/person/day, sanitary use is ~ 15 m³/day — 30% of the 50 m³/day promised there, while "mainly sanitary" would require ≥ 417 workers [COMPUTED]. The six questions below concern what the numbers do not say.

Q70. Source and definition of the "200–800" and "approx. 250" figures — document, methodology, reference capacity, employees vs contractors

- **Basis:** post: "200 to 800 people - depending on the stage", "approx. 250 permanent jobs" [TIER A - post]; the numbers appear neither in the MPZP resolution (full-text check — zero employment provisions) nor in the OOS forecast (§11.10 and §11.11.B — qualitative only; §11.15: water demand "dependent on [...] the number of workers" — as an unknown variable) [TIER A - BIP]; Virginia JLARC: a typical data-center building has ~ 50 staff, "about half" of them contractors [TIER A]; Google Council Bluffs: 250 operator employees and ~ 900 "on site" with suppliers — a $\sim 3.6\times$ divergence [TIER B]; 250 at 500 MW = 0.5 jobs/MW (top of the hyperscale band), at 1 GW = 0.25 (lower half of the range) [TIER B; COMPUTED].
- **Demand:** written indication of the source of both figures (document, author, methodology) — at which connection capacity and which expansion stage they apply, and whether they include external contractors' workers (security, servicing) — together with the construction-stage schedule and a person-years estimate; in the form of a reply to a public-information request, not a Facebook graphic.
- **Justification:** without a definition (employee or contractor, which capacity, which stage) the figure cannot be compared with benchmarks or settled after launch; if the 250 includes contractors, the operator's own headcount may be ~ 125 — a wholly different conversation about "250 jobs".

Q71. Reconciling the gmina's own statements — "several thousand"/"400" vs "200–800"/"250"

- **Basis:** the wójt (2.04.2026): "a huge construction site where several thousand people will find work", property taxes "two and a half to three power plants" [TIER D - ebelchatow.pl]; the wójt (May 2026): "ultimately around 400 people are to find employment there", construction demand "we count in the thousands", 18 buildings on >100 ha, construction from mid-2028 [TIER D - ddbelchatow.pl]; the post (August 2026): construction 200–800, operations ~ 250 [TIER A - post]; the package communicated by the office shrank within a few months (April–August 2026) by $\sim 40\%$ (permanent jobs), with construction figures down several-fold at least [COMPUTED].
- **Demand:** a statement of which numbers are current and official, what changed them (project change? correction of earlier estimates?) — and a rectification indicating which earlier statement was imprecise.
- **Justification:** residents cannot comment on a plan with numbers that change every season; an order-of-magnitude divergence between the office's own communications is stronger evidence of "soft" numbers than any external criticism — all the more so since the earlier figures came publicly from the wójt himself.

Q72. Local share — how many jobs for gmina and powiat residents, a training programme, a written local minimum

- **Basis:** the post lists positions (IT engineers, cybersecurity, technicians, infrastructure maintenance, security) without a word about local recruitment [TIER A - post]; per Good Jobs First "highly skilled jobs, especially during construction, are filled by out-of-town workers who leave when the construction is over", and US DC builds are done by travelling specialist crews [TIER B]; in Poland DCs are built by specialized contractors — Porr (Vantage Warsaw), Mercury Engineering (Sinersio) [TIER B - Spectis]; "the biggest players do not hire top specialists on site, but fly them in when something breaks" (Atman; the critical importance of an airport was indicated) [TIER B - euronews]; the powiat labour market: unemployment 5.2% (July 2026), with average wages for years among the highest in Poland thanks to the PGE complex (mine: 9–10 thousand PLN gross; ~9,800 jobs; per the transition plan, a fall to ~4,262 mine+plant jobs by 2030) [TIER A/B]; the MPZP cannot bind the investor on employment — a local commitment requires a contract (cf. Q50).
- **Demand:** a declaration of how many of the ~250 permanent jobs and of the 200–800 construction positions are intended for gmina and powiat residents; a training/reskilling programme (with the Bełchatów PUP and vocational schools) with a schedule starting before construction (2027–2028); a written investor commitment to a local-employment minimum, e.g. within a host-community agreement.
- **Justification:** without a commitment, "local employment" remains a slogan — and in a powiat losing thousands of PGE jobs, the qualifications the campus will need are only now being built; that is a multi-year process that must be planned before construction, not after it.

Q73. The basis of the "other businesses will also develop" multiplier — sectors, numbers, concrete talks

- **Basis:** post: "other businesses will also develop around such a large facility" providing "service, logistics, construction, transport or gastronomy" — without a single number, company name or commitment [TIER A - post]; quasi-experimental study (Brookings, ~1,500 facilities, post-revision version of 10.08.2026): a typical county gains ~+100–200 jobs, wages unchanged, house prices +2–5% [TIER A/edu]; industry multipliers (e.g. 875,000 jobs "anchored" by Irish data centres against 19,500 direct) count the entire digital economy [TIER D]; Quincy (Washington state) after 15 years of boom: DC taxes covered ~75% of all city taxes, but 4/5 of pupils still eligible for free meals and operating facilities staffed by "several dozen workers" [TIER B - NYT].
- **Demand:** the basis of the claim (the gmina's own analysis? investor data? patterns from other campuses?); the expected sectors and order of magnitude of jobs; information whether the gmina or the investor is in talks with specific service providers about operating in the gmina — and if so, with which entities.
- **Justification:** this is the only paragraph of the post without a single number; if the claim is to be more than a declaration of faith, it needs a document and numbers — and if there are none, it is more honest to write "some will emerge" and leave residents with realistic expectations.

Q74. Consistency of the worker headcount with "Myth #2" — water "mainly sanitary" vs 250 jobs

- **Basis:** "Myth #2": $\sim 50 \text{ m}^3$ of water per day, used "mainly for the workers' sanitary purposes" [TIER A - series post]; arithmetic: $250 \text{ workers} \times 60 \text{ l/person/day} = \sim 15 \text{ m}^3/\text{day}$ — 30% of the promised $50 \text{ m}^3/\text{day}$; "mainly" ($>50\%$) would require ≥ 417 workers [COMPUTED]; OÖS forecast §11.15: water demand "dependent on [...] the number of workers" [TIER A - BIP].
- **Demand:** one consistent version of both numbers: either $50 \text{ m}^3/\text{day}$ with at least 417 permanent workers (then where does "approx. 250" come from — and at what capacity?), or 250 workers with $\sim 15 \text{ m}^3/\text{day}$ for sanitary purposes (then what consumes the remaining $\sim 70\%$ of the water?) — with an indication of the technical document both figures come from.
- **Justification:** two posts of the same series give numbers that arithmetically exclude each other; a common source (the investment's technical datasheet) would close both topics at once and also order the earlier question Q36 on the breakdown of the $50 \text{ m}^3/\text{day}$.

Q75. A binding permanent-jobs minimum — investment agreement or host-community agreement, with penalties and annual reporting

- **Basis:** the post's figures have no contractual form — the series' fourth soft numeric commitment (after $50 \text{ m}^3/\text{day}$ from "Myth #2", the acoustic enclosures of "Myth #5" and the tree inventory of "Myth #6") [TIER A - post; UNVERIFIED - no document]; in the US no state reports both promised and actually created data-center jobs, and the average tax-incentive cost in DC "megadeals" is USD 1.95 million per job [TIER B - Good Jobs First]; a local plan cannot financially bind the investor beyond the planning fee — only a civil-law contract can (cf. Q16, Q50); the Gmina Council votes on the plan probably in October/November 2026.
- **Demand:** writing a minimum permanent-jobs figure (we propose: the promised 250) into the investment agreement or a host-community agreement — with contractual penalties for non-delivery and mandatory annual reporting of jobs actually created (operator employees separately from contractors, and the share of gmina and powiat residents separately).
- **Justification:** a promise nobody settles is not information but advertising — "250 jobs" can be both true and an advertisement at once; the first reporting round after Stage 1 goes live will show whether the "myth-busting" series creates myths of its own.

Theme 16 — The "Myth #9" post (August 2026) — the gmina budget: taxes, schools, sport and "at the investor's cost" (Q76–Q81)

The ninth post in the series (co-produced "with the investor") answers the claim that "only the investor will profit from the project, and for an ordinary resident of the gmina it means nothing but losses" — with "large and regular revenues to the gmina budget from property taxes", thanks to which "new roads, sewage networks, schools or sports facilities" could be built, and a promise that "at the investor's cost the power grid and roads will be modernized", to the benefit "of all residents" [TIER A - post]. Independent verification (full analysis: «Belchatow_Mit9_PL.pdf», main report §2.4.16) established, among other things: the core is true — property tax will be the gmina's largest recurring revenue from the investment, and the residents' computation yields approx. PLN 11.3–21.4 million per year at 500 MW (7–13% of the gmina's current revenues; at $\sim 1 \text{ GW}$: PLN 21–39 million, 13–24%) [COMPUTED] at the gmina's own 2026 rates (31.14 PLN/ m^2 of buildings; Council resolution) [TIER A]; but the full tax obligation arises on 1 January following the completion of each building (construction — per the wójt — from mid-2028), servers (a data center's most valuable asset) remain outside the tax, and PIT/CIT revenues at ~ 250 jobs

are at most on the order of PLN 0.2–2 million per year (under a Polish Investment Zone exemption the CIT component can fall to zero — main report §7.4) [TIER A; COMPUTED]; the words "school" and "sport" do not appear once in the entire planning package, the investor appears in the plan's financial provisions not once, and those provisions write in a gmina expense on water/sewage networks assigned to the water utility or the gmina budget [TIER A - BIP, full-text audit]; property tax is a non-earmarked revenue — no regulation ties it to schools, sport or roads [TIER A]; "modernization at the investor's cost" is a double half-truth: grid connection is a statutory duty (and above 1 kV the investor pays only a quarter of the actual outlays), while modernizing public roads would require a contract that has not been published — an ordinary local plan has no statutory mechanism to force investor contributions (the "urbanist contract" applies only to integrated investment plans/revitalization) [TIER A - statutes; UNVERIFIED - no contract]; the international distribution of benefits: Loudoun County (Virginia) draws 38% of revenues from data centers because it taxes the computer equipment (\$4.15/\$100) — which Polish law does not; Frankfurt's municipalities keep ~10% of the industry's fiscal effect ("Schlechte Steuerquelle für Kommunen" — FAZ); Irish councils ~€62.5 million a year from 89 facilities [TIER A/B]; and even Loudoun warns of a revenue "plateau" within 5–10 years and restricted further growth by a 7–2 vote [TIER A/B].

Q76. A forecast of property-tax revenues — an assumptions table (floor area per phase, rates, structures, land, calendar) published for public verification

- **Basis:** the post promises "large and regular revenues" without a single number — the series' sixth soft commitment, the first fiscal one [TIER A - post; UNVERIFIED - no document]; residents' computation: at the gmina's 2026 rates (31.14 PLN/m² buildings, 1.20 PLN/m² land, 2% structures), 300–500 thousand m² of buildings (600–1,000 m²/MW; anchored on Atman WAW-3: ~970 m² gross/MW) and 50–70 ha of land — PLN 11.3–21.4 million/year at 500 MW; PLN 21–39 million at ~1 GW; 7–13% / 13–24% of gmina revenues (PLN 164.1 million, 2026) [COMPUTED]; tax obligation from 1 January following completion of each building (art. 6(2) of the Local Taxes Act) [TIER A]; earlier question on independent verification of the forecast — Q17.
- **Demand:** publication of a revenue forecast as an assumptions-and-result table: building floor area by phase, rates applied (and whether the gmina intends maximum rates), an estimate of structure value, land area, and the year the obligation begins for each phase — together with a declaration to subject the forecast to independent verification (e.g. an audit firm or tax adviser).
- **Justification:** if residents can compute the revenues into ranges from public data, the office — holding the investor's data — can state an exact figure; a one-page table turns "large" into a number and lets councillors pass budgets on full information rather than trust in an adjective.

Q77. The calculation behind "2.5–3 × the power plant" — what the energy complex pays and how the multiplier converts to zlotys

- **Basis:** the wójt (2.04.2026): property-tax revenues "like two and a half to three power plants" [TIER D - ebelchatow.pl] — a figure without a calculation, recorded as [UNVERIFIED] in main report §7.2; the residents' computation (PLN 11.3–39 million/year depending on capacity) back-solves what the power plant pays today (approx. PLN 4–15 million a year on a literal reading) [COMPUTED]; the comparison is fully verifiable, since both taxpayers sit in the same gmina.
- **Demand:** show the comparison's arithmetic: the energy complex's tax payments taken as the base (year, tax), the multiplier applied and the result in zlotys — together with an indication of whether the result fits within the Q76 forecast; if the comparison was an approximation — a correction.

- **Justification:** the only public fiscal figure of this project so far comes from a press interview with no arithmetic; the power-plant comparison can be checked by the treasurer in five minutes — and if it cannot be reconciled with Q76, one of the numbers is wrong, and both sides should know before the budget starts depending on them.

Q78. The scope and legal form of "modernization of the power grid and roads at the investor's cost" — a list of projects, a contract, a schedule, security

- **Basis:** the post: "at the investor's cost the power grid and roads will be modernized" [TIER A - post]; grid connection is a statutory duty, and above 1 kV the fee is one quarter of actual outlays (Energy Law, art. 7(8)(1)) [TIER A]; the plan's financial provisions: power networks under the Energy Law regime (operators), water/sewage — the utility or the gmina budget; the investor in the financial provisions: zero occurrences; the word "cost": zero in the resolution [TIER A - BIP]; an ordinary local plan has no statutory mechanism for investor contributions — the urbanist contract only for integrated investment plans/revitalization (art. 37ed–37i of the Planning Act) [TIER A]; the previous, undocumented promise of the same content — "Myth #7" ("the investor will pay for all activities [...] building roads etc.") and question Q68.
- **Demand:** (i) a list of the specific projects covered by the "modernization" (which road sections, which network elements, on or off the site); (ii) the legal form of each obligation (an investment agreement with the gmina? DŚU conditions? a contract with the operator?) with a schedule and performance security (deposit/guarantee); (iii) a freedom-of-information request: whether any infrastructure agreement or understanding between the gmina and the investor has been concluded — if so, disclosure of its scope.
- **Justification:** for the second time in the series, infrastructure "at the investor's cost" is promised without a document; in an ordinary local plan the promise has no statutory footing — the only real form is a contract, and its absence means that in case of non-performance the gmina will have a claim to nothing but an old Facebook post.

Q79. The mechanism behind "thanks to this it will be possible" — an earmarking resolution, a multi-annual forecast updated for the revenues, or an investment fund, with annual reporting

- **Basis:** the post: "thanks to this it will be possible to build new roads, sewage networks, schools or sports facilities" [TIER A - post]; property tax is a non-earmarked revenue — no regulation ties it to the listed purposes (Act on local-government revenues, art. 4) [TIER A]; the planning package contains no list of tasks to be financed from the new revenues ("school", "sport": zero occurrences) [TIER A - BIP]; the gmina already funds roads, sewage, schools and rehabilitation without any data center (2026 budget: incl. Kielchinów–Augustynów, Wola Mikorska, school extensions in Dobrzelów and Janów) [TIER A - gmina communiqué].
- **Demand:** a Gmina Council resolution earmarking the data center's property-tax revenues for a stated list of tasks (with amounts and years) — or entering those revenues into the multi-annual financial forecast as the source of specific investments, or establishing an investment fund fed by this tax — in every variant with mandatory annual reporting of execution.
- **Justification:** a spending promise without a legal act binds nobody through 10+ years of campus construction; earmarking is the standard by which local governments secure host communities of major investments — its absence leaves "schools and sport" in the category of campaign declarations, regardless of the revenue scale.

Q80. The boundaries of taxation — the classification of structures (transformers, generators, containers), protecting the base from classification optimization, the post-TK SK 14/21 regime

- **Basis:** the taxable object: buildings, structures, land — IT equipment outside the base; after the 1.01.2025 amendment, the catalogue of structures includes machine foundations, containers permanently attached to land, installations (Annex 4 to the Local Taxes Act) [TIER A]; tax advisers point to classification disputes at the structures boundary (transformers, technical equipment) and to investors' classification-optimization practice [TIER B]; the structures base accounts for approx. PLN 1.4–5 million a year in the residents' computation — an amount sensitive to classification [COMPUTED]; the taxable base of data centers has already been revised judicially (Constitutional Tribunal SK 14/21 → amendment of 27.11.2024, in force 1.01.2025) — main report §6.5; earlier question: Q17.
- **Demand:** the gmina's position: (i) how it will classify the campus's accompanying infrastructure (transformer stations, standby generators, containers, yards and foundations) — and whether it will seek an individual interpretation; (ii) how it intends to protect the tax base from assets being shifted out of taxable categories; (iii) under which regime (old/new) the Q76 revenue forecast is computed.
- **Justification:** the difference between an honest and an optimized classification can reach millions of zlotys a year — and the disputes run for years in administrative courts; a gmina that does not set the boundary at the outset will set it in lawsuits after the campus opens, when revenues turn out lower than "large".

Q81. A full net balance — the revenue plan (Q76) set against the gmina's own costs: the plan's networks, road maintenance after construction traffic, services, the "plateau" risk

- **Basis:** the MPZP justification records, among the plan's financial effects, a gmina expense on water/sewage networks ("to the extent they are the gmina's own tasks") [TIER A - BIP]; the planning-procedure costs statutorily fall on the gmina (art. 21 of the Planning Act) — amounts unpublished (Q65) [TIER A]; 18 buildings and years of construction traffic load the public roads (maintenance: the manager, public budgets) [TIER D - wójt's statements]; Loudoun County — the exemplary revenue case — itself warns of a revenue "plateau" within 5–10 years and of budget dependence on a single stream [TIER A - county data]; environmental and amenity costs documented in Myths 2–6 (water, noise, greenery).
- **Demand:** publication of the investment's net balance for the gmina budget: the revenue plan (Q76) minus planned costs (water/sewage networks as the gmina's own task, road maintenance, services and safety, any investor incentives) — with rate assumptions (whether they stay below statutory maxima) and a sensitivity analysis for phase delays and the "plateau" scenario.
- **Justification:** the post answers the "myth of nothing but losses" with nothing but revenues — a mirror image of the error it debunks; only the net balance answers the resident's question "what do I get out of this" — and lets the council pass the plan with open eyes instead of discovering the costs after the fact.

Act now / Działaj teraz

The consultation window closed on 28 August 2026 — but the matter continues. Three actions, all free:

1. **Write to the Wójt and your councillors** — pick 3–8 of the questions above, paste them into the template below (it also works for follow-up correspondence), sign, send. **The Gmina Council is expected to vote on the plan around October/November 2026** — the Domiechowice-district councillors vote with the full council; many identical letters count the same way identical uwagi did.
2. **FOI requests** — for the RDOŚ + PPIS letters (second template below) and to **PSE** for the system-impact study and the network-cost split (Template B2, see Q48 — subject to business-secret refusal). Statutory reply deadline 14 days (extendable to 2 months).
3. **Put the questions in writing** — paste your chosen questions into the letters and FOI templates; ask the Wójt to confirm answers *in writing* (the questions were also put at the 13 August open meeting; its minutes are part of the consultation record).

Next stages: the Gmina Council votes on the plan around October/November 2026, and the full map of remedies (councillors, environmental decision, administrative court) is in the main report (§ 6.7).

Submission channels (all TIER A official):

- E-mail: sekretariat@ugbelchatow.pl
- Paper: Urząd Gminy Bełchatów, ul. Kościuszki 13, 97-400 Bełchatów

Template A — Polish *uwagi do MPZP* (copy/paste, fill [BRACKETS])

Bełchatów, dnia r.

Wnioskodawca:

[Imię i nazwisko]

[Adres zamieszkania]

[E-mail / telefon]

ADRESAT: Wójt Gminy Bełchatów

Urząd Gminy Bełchatów

ul. Kościuszki 13, 97-400 Bełchatów

(sekretariat@ugbelchatow.pl)

UWAGI DO PROJEKTU MIEJSCOWEGO PLANU ZAGOSPODAROWANIA

PRZESTRZENNEGO DLA OBSZARU STREFY GOSPODARCZEJ W MIEJSCOWOŚCI

DOMIECHOWICE

(w trybie art. 8i ust. 1 pkt 1 w zw. z art. 17 pkt 11 i 13 ustawy z 27 marca

2003 r. o planowaniu i zagospodarowaniu przestrzennym - Dz.U. 2026 poz. 538)

Oświadczam, że [jestem / nie jestem] właścicielem albo użytkownikiem
wieczystym nieruchomości objętej projektem planu lub nieruchomości
sąsiadującej.

Wnoszę o wprowadzenie następujących zmian do projektu planu:

A. [wklej wybrane żądania - np. z Q9: limit hałasu 50/40 dB na
granicy terenu, klasa 2a Dz.U. 2014 poz. 112]

B. [wklej z Q10: limit poboru wody m³/dobę w §20]

C. [wklej z Q11: obowiązek odzysku ciepła odpadowego wg EED
art. 26 ust. 6]

D. [wklej z Q18: wykreślenie §11(5) albo wymóg raportu Seveso]

UZASADNIENIE:

[Krótko - po 1-2 zdaniach na każdy punkt, np. "Punkt A jest niezbędny
dla ochrony warunków snu mieszkańców Domiechowic zgodnie z klasą 2a
rozporządzenia Dz.U. 2014 poz. 112."]

Z poważaniem,

.....

[własnoręczny podpis - przy e-mailu wystarczy treść, urząd może
zażądać uzupełnienia podpisu w ciągu 7 dni]

Template B — Polish FOI request for the RDOŚ + PPIS letters

Send to **both**:

- **RDOŚ Łódź**: ul. Traugutta 25, 90-113 Łódź — iod.lodz@rdos.gov.pl
- **PPIS Bełchatów**: ul. Okrzei 49, 97-400 Bełchatów — sekretariat.psse.belchatow@sanepid.gov.pl

Miejscowość, data:

Wnioskodawca:

[Imię i nazwisko]

[Adres]

[E-mail]

ADRESAT: [Regionalny Dyrektor Ochrony Środowiska w Łodzi

ul. Traugutta 25, 90-113 Łódź

e-mail: iod.lodz@rdos.gov.pl

- LUB -

Państwowy Powiatowy Inspektor Sanitarny w Bełchatowie

ul. Okrzei 49, 97-400 Bełchatów

e-mail: sekretariat.psse.belchatow@sanepid.gov.pl]

WNIOSEK O UDOSTĘPNIENIE INFORMACJI PUBLICZNEJ

(podstawa prawna: art. 2 ust. 1 i art. 10 ust. 1 ustawy z 6 września

2001 r. o dostępie do informacji publicznej - Dz.U. 2022 poz. 902;

oraz art. 13 i art. 21 ustawy z 3 października 2008 r. o udostępnianiu

informacji o środowisku i jego ochronie, udziale społeczeństwa w ochronie

środowiska oraz o ocenach oddziaływania na środowisko - Dz.U. 2026 poz. 670)

Działając jako obywatel RP / mieszkaniec Gminy Bełchatów, wnoszę o

udostępnienie informacji publicznej polegającej na przesłaniu na

wskazany adres e-mail pełnej treści:

1) Pisma Regionalnego Dyrektora Ochrony Środowiska w Łodzi o znaku
W00Ś.411.636.2025.AJa.2 z dnia 29 grudnia 2025 r. - uzgodnienie
zakresu prognozy oddziaływania na środowisko dla projektu MPZP dla
obszaru strefy gospodarczej w Domiechowicach (Gmina Bełchatów);

2) [dla PPIS] Pisma PPIS w Bełchatowie o znaku ZNS.90280.1718.2025
z dnia 7 stycznia 2026 r. - uzgodnienie zakresu ww. prognozy.

Informację proszę udostępnić w całości, łącznie z załącznikami, w
formie elektronicznej (PDF). Wnoszę o bezpłatne udostępnienie (cel:
udział społeczeństwa w postępowaniu planistycznym; art. 15 u.d.i.p.).

Termin na odpowiedź: bez zbędnej zwłoki, nie później niż 14 dni

(art. 13 ust. 1 u.d.i.p.).

Z poważaniem,

.....

Statutory reply: **14 days** (extendable to 2 months for "sprawy szczególnie skomplikowane"). Appeal on silence/refusal: *skarga do WSA* (Wojewódzki Sąd Administracyjny) within 30 days.

Template B2 — Polish FOI request to PSE for the KSE system-impact study and the network-cost split (Q48)

Recipient: **Polskie Sieci Elektroenergetyczne S.A.**, ul. Warszawska 19, 05-520 Konstancin-Jeziorna (postal address; check the current ePUAP mailbox / access-to-information e-mail at pse.pl → Kontakt).
Note: alternative addressee: if the connection is implemented in the distribution network (e.g. a 110 kV GPZ — an open question, see §3.5 of the main report), the distribution system operator (OSD; here: PGE Dystrybucja) is also a proper addressee for these requests. The form takes 5 minutes: fill in, sign, send. (Polish legal text — send as-is.)

Miejscowość, data:

Wnioskodawca:

[Imię i nazwisko]

[Adres]

[E-mail]

ADRESAT: Polskie Sieci Elektroenergetyczne S.A.

ul. Warszawska 19, 05-520 Konstancin-Jeziorna

[adres e-mail / ePUAP wg danych kontaktowych na pse.pl]

WNIOSEK O UDOSTĘPNIENIE INFORMACJI PUBLICZNEJ / INFORMACJI ŚRODOWISKOWEJ

(podstawa prawna: art. 2 ust. 1, art. 4 ust. 1 i art. 10 ust. 1 ustawy z 6 września 2001 r. o dostępie do informacji publicznej - Dz.U. 2022 poz. 902 - wobec spółki wykonującej zadania publiczne w zakresie przesyłu energii elektrycznej; oraz art. 13 i art. 21 ustawy z 3 października 2008 r. o udostępnianiu informacji o środowisku i jego ochronie, udziale społeczeństwa w ochronie środowiska oraz o ocenach oddziaływania na środowisko - Dz.U. 2026 poz. 670)

Działając jako obywatel RP / mieszkaniec Gminy Bełchatów, wnoszę o udostępnienie na wskazany adres e-mail informacji w następującym zakresie, związanym z planowanym przyłączeniem Hyperscale Data Center Bełchatów-Domiechowice (inwestor: DATA CENTER BEŁCHATÓW Sp. z o.o., KRS 0000882677, gmina Bełchatów, woj. łódzkie):

- 1) ekspertyzy wpływu na system elektroenergetyczny (KSE), o której mowa w art. 7 ust. 8e ustawy - Prawo energetyczne, sporządzonej na rzecz postępowania o określenie warunków przyłączenia ww. obiektu - w zakresie, w jakim dokument istnieje, łącznie z przyjętymi założeniami;
- 2) informacji o zakresie inwestycji sieciowych (linie i stacje, w tym GPZ) warunkowanych lub wynikających z wydanych warunków przyłączenia dla ww. obiektu;
- 3) informacji o podziale kosztów wzmocnień sieci związanych z ww. przyłączeniem: opłata przyłączeniowa ponoszona przez inwestora (art. 7 ust. 8 pkt 1 ustawy - Prawo energetyczne) versus koszty pokrywane przez operatora i refinansowane w taryfach.

Informację proszę udostępnić w formie elektronicznej (PDF). Wnoszę o bezpłatne udostępnienie (cel: udział społeczeństwa w postępowaniu planistycznym i ocenie oddziaływania na środowisko; art. 15 u.d.i.p.).

Termin na odpowiedź: bez zbędnej zwłoki, nie później niż 14 dni (art. 13 ust. 1 u.d.i.p.).

Z poważaniem,

.....

Statutory reply: **14 days** (extendable to 2 months). **Caveat (Q48):** PSE may refuse disclosure citing business secrecy (art. 5 u.d.i.p.) or disputing the public-information status on the company's side — then **the refusal itself, with its scope, is information** (what exactly the secret covers, and what that implies for the credibility of the "PSE-confirmed safety" message). Appeal path: *skarga do WSA* against a refusal (30 days from the decision); in the event of inaction — first a **reminder (ponaglenie)** demanding that the act be performed, and only once it proves fruitless a *skarga na bezczynność* (inaction complaint) to the WSA; should PSE dispute organ status — the ordinary-court route (*sąd okręgowy*). Please file the reply or refusal into the MPZP consultation record (by 28 August 2026).

Sources / Źródła

Polish primary documents (TIER A — government / KRS):

- Draft MPZP Uchwała nr XXI/169/2025 Rady Gminy Belchatów z 25 września 2025 r.; MPZP §7, §9, §11(1–5), §20, §22, §27, §28(1)(d), §28(3)(c–j).
- SEA *Prognoza oddziaływania na środowisko* — author Łukasz Beń, Belchatów 28 Jul 2026; §7 (PM10 klasa C), §11.3 (no monitoring), §11.10 (cumulative = dk74 only), §11.11.A–L, §11.15 (water), §11.17 (RDOŚ/PPIS letter refs).
- KRS: DATA CENTER BELCHATÓW Sp. z o.o. **0000882677**; NEXT DC Sp. z o.o. **0001191076** (via krs-pobierz.pl, Rejestr.io).
- Polish noise limits: **Dz.U. 2014 poz. 112** (Rozporządzenie w sprawie dopuszczalnych poziomów hałasu w środowisku), Annex Tabela 1, class 2a industrial column = 50/40 dB LAeqD/LAeqN.
- EIA screening: **Dz.U. 2019 poz. 1839** §3 ust. 1 pkt 54.
- Planning: ustawa o planowaniu i zagospodarowaniu przestrzennym, **Dz.U. 2026 poz. 538**; info-about-environment: **Dz.U. 2026 poz. 670**.
- Property tax: **Dz.U. 2025 poz. 707**; Trybunał Konstytucyjny SK 14/21 (4 July 2023).
- FDI: **Dz.U. 2026 poz. 47** (ustawa o kontroli niektórych inwestycji).
- Official letters referenced: **RDOŚ Łódź WOOŚ.411.636.2025.AJa.2 (29 Dec 2025)**; **PPIS Belchatów ZNS.90280.1718.2025 (7 Jan 2026)**.
- ugbelchatow.pl consultation notice (31 Jul 2026): meeting 13 Aug 16:00, designer duty hour 17:00–18:00, deadline 28 Aug 2026, room 32, sekretariat@ugbelchatow.pl.
- Energy Law (consolidated Dz.U. 2026 poz. 43): art. 7 ust. 3a (determination of connection conditions), ust. 8 item 1 (¼-of-outlays connection fee), ust. 8e (system-impact study), ust. 8g item 5 (150-day deadline) — Theme 11.
- PSE S.A.: "Raport o funkcjonowaniu KSE 2025" (2026; table 3.2: 2025 maximum demand 27 550 MW; reserves 11 131 MW); notice of 12 Jan 2026 (record 27.6 GW net, 9 Jan 2026); "Stopnie zasilania" page (≥300 kW customers) — Theme 11 (Q48, Q49, Q51).
- URE: President of URE decision on 2026 capacity-charge rates (households 4.29–24.05 PLN/month by usage band; total capacity-market cost ~PLN 10 bn — an industry estimate by energetyka24); "UREgulowana wiedza konsumenta" series (bill structure) — Q50.
- Regulation of the Council of Ministers of 8 Nov 2021 on detailed operating conditions of the power system (Dz.U. 2021 poz. 2209, § 6 — exemptions from restrictions: incl. critical infrastructure) — Q49.

EU law (TIER A — EUR-Lex):

- Directive (EU) 2023/1791 (recast EED) — Art. 12 (≥500 kW IT reporting), Art. 26(6) (waste-heat recovery mandate for DCs >1 MW), Annex XI.
- Commission Delegated Regulation (EU) 2024/1364 (reporting template).

- Directive 2002/49/EC (END) — reporting thresholds, not health limits.

Health / science (TIER A):

- WHO 2009 *Night Noise Guidelines for Europe* — voluntary L_{night} 40 dB health target (separate from the binding Polish limit).
- WHO 2018 *Environmental Noise Guidelines* — road L_{den} 53 / L_{night} 45; no industrial single-value recommendation.
- Ember European Electricity Review 2024 — Polish grid 662 gCO₂/kWh (2023).
- Harvard/Frontiers 2026 — backup-generator health damage \$53–99 M/yr per large AI cluster.
- EESI — hyperscale WUE 1.9 L/kWh average; Li et al. (arXiv 2304.03271, Commun. ACM) — per-site consumption ~0–9 L/kWh, ~80 % of withdrawal evaporates.

Press (TIER B/D — used only where cited):

- Onet (Kałach, 15 Jun 2026) — gmina statement naming Partners Group; wójt quote on lignite baseload; Ministry of Climate reply; resident quotes; Jakub Wiech "puste inwestycje".
- ebelchatow.pl (Apr 2026) — 500 MW confirmed, GPZ Kurnos, "kilka tysięcy" jobs, "2.5–3× Elektrownia" tax claim.
- KNews.pl, swiatoze.pl, itwiz.pl, baxtel.com — project context.
- Público, Jornal de Negócios, ECO, Wikipedia — Operação Influencer / Salema / Start Campus Sines.
- Ember EU ETS 2022 — Elektrownia Bełchatów = #1 EU emitter since 2005.
- money.pl, Energetyka24, CIRE, OKO.press, Enerdata — Bełchatów unit closure 2030–2036.
- Utility Dive (2 Oct 2025, on the official PJM market monitor's report of 1 Oct 2025) — data centres as the "primary reason" for high capacity prices (+USD 7.3 bn / +82% in one auction); own-generation recommendation for new DCs.
- Microsoft Source (7 Jul 2022) / WEF — the Dublin data centre participates in EirGrid's DS3 system-services market via Enel X: grid-interactive UPS.
- NucNet (8 Feb 2025) — PGE 2nd large nuclear at Bełchatów, preliminary.

Theme 17 — Investor information meeting in Emilin (1 September 2026) — "immersive cooling" without a number or a document (Q82–Q87)

The first meeting organized directly by the investor (not by the gmina): on 31 August 2026 the "Data Center Bełchatów project team" announced on Facebook a "cycle of open information meetings" for residents of Domiechowice, Emilin, Zalesna and nearby streets; the first duty hour took place on 1 September 2026 in the CSiR community hall in Emilin [TIER D - FB invitation]. According to residents' accounts, cooling was presented as **"immersive cooling"** — similar to what is used "in transformer cooling" — with no number, variant, or document [TIER D - oral account; UNVERIFIED - recording pending]. Independent verification (main report §2.4.17) found among other things: this is the fourth cooling description in four months; the server-room technology name settles neither the campus's water nor its noise (both are decided by the campus loop and the cooler fleet); a full 500 MW of immersion would be the

largest such deployment in the world ($\sim 1.25 \times$ Riot Corsicana — a Bitcoin mine, not AI) and the first in AI compute [COMPUTED]; at that scale it means on the order of 5,000–22,500 m³ of dielectric fluid on the campus site [COMPUTED]; none of the five planning documents mentions any cooling technology or district heating (full-text verification with OCR).

Q82. A written cooling-technology specification — which of the four descriptions is the design one?

- **Basis:** four descriptions in four months: June — "water circulating in the system" + rainwater "for emergency cooling" [TIER D - Onet]; "Myth #2" — "it will not be used for cooling" [TIER A - post]; "Myth #3" — hybrid dry loop [TIER A - post]; 1 September — "immersive cooling" like in transformers [TIER D - oral account; UNVERIFIED - recording pending]; in the planning documents — zero occurrences of cooling/immersion terms (full-text + OCR search). Expands Q31 and Q45.
- **Demand:** a written technology specification (after each duty hour of the cycle): the variant — direct-to-chip plates / single-phase immersion / two-phase / mixed; the share of capacity cooled by each method; design PUE and WUE; the name of the integrator or supplier — or a one-sentence statement that the technology has not yet been chosen.
- **Why it matters:** an oral description, without a recording or minutes, is not a commitment; since a "cycle" of meetings was announced, answers should arrive in writing — otherwise the fifth description will be as unverifiable as the four before it.

Q83. Dielectric fluid: type, volume, safety data sheet, fire class — and does it contain PFAS?

- **Basis:** immersion cooling of 500 MW IT at industry indicators of 10–45 L/kW means on the order of 5,000–22,500 m³ of fluid on campus [COMPUTED]; single-phase fluids are hydrocarbons/esters (flash point $\sim 160^\circ\text{C}$), two-phase fluids are PFAS by definition — after 3M left their production (end of 2025) commercial availability declined significantly, and the EU PFAS restriction under REACH is at the final stage of the ECHA process (final consultation closed 25 May 2026, opinion expected in late 2026) [TIER C - White & Case]; the fire-safety instruction of a production building must be updated "after a change of technology" (§ 6 MSWiA regulation) [TIER A].
- **Demand:** the fluid variant + safety data sheet (SDS), total volume/mass of fluid per hall and per campus, flash point and fire classification (CLP), leak-containment procedures (e.g. triple containment), impact on the fire-safety instruction and fire-protection expert arrangements.
- **Why it matters:** this is the first technology variant bringing thousands of m³ of fluid onto the campus site — a risk category the environmental forecast does not analyze at all; the SDS question has a one-sentence answer.

Q84. The dry-cooler fleet: how many units, how many dB(A) — and where is the noise propagation model?

- **Basis:** immersion does not remove campus-level heat rejection: 500 MW IT means ~ 550 MW of heat to reject; at catalog units of the 1.236 MW class (60/40°C fluid) that is ~ 445 coolers [COMPUTED] in the 64–73 dB(A)-at-10 m noise class [TIER C/D - catalogs]; the night-time limit for single-family housing (Domiechowice, Emilin) is 40 dB LAeqN [TIER A]; a propagation model with a source inventory still does not exist (Q37, Q44, Q57).

- **Demand:** the number, type and placement of dry coolers (also after expansion to ~1 GW), units' acoustic data (dB(A) at 10 m, tonality), a noise propagation model with a source inventory, and confirmation that 50/40 dB (LAeqD/LAeqN) will be maintained at neighboring plot boundaries.
- **Why it matters:** the "like in transformers" analogy suggests passive silence — but the campus's noise is decided by the cooler fleet, so it is the fleet's parameters that must appear in documents, not in a metaphor.

Q85. Water: design WUE and the complete water-law permit set — does cooling draw anything at all?

- **Basis:** "no water for cooling" is achievable with a dry loop — but waterlessness is delivered by the loop, not by the technology's name; business water abstraction requires a water-law permit at any volume (the art. 395(7) ≤ 5 m³/day exemption of the Water Law covers only "ordinary use" — households) [TIER A]; the promised 50 m³/day ("Myth #2") itself requires a permit; rainwater discharge from sealed surfaces requires a permit regardless of cooling technology [TIER A]; the balance (humidification, sanitary, fire) still does not exist (Q46, Q32, Q60).
- **Demand:** design WUE (L/kWh) broken down by source (cooling/humidification/sanitary/fire), copies of water-law permit applications (abstraction + rainwater) at filing, written confirmation whether rainwater enters the cooling circuit (June) or not ("Myth #3").
- **Why it matters:** four descriptions of water and coolant require one balance; water-law permits are public and verifiable — meeting declarations are not.

Q86. Waste heat: will the EIA report analyze reuse for Bełchatów's district heating network?

- **Basis:** immersion delivers fluid at 52–60°C — full-grade district heat: 1 MWe of data center $\approx$ 1 MWt for the network, 40–50 MWe covers ~75% of the heat demand of a 30,000-resident town [TIER C - Forum Energii]; the city of Bełchatów (heated from the Power Plant, 373.8 MWt, ~90% of households) has been formally seeking a new heat source for the post-2035 period since April 2025 (demand: 100 MW) [TIER A]; in the environmental forecast the word "district heating" does not appear once [TIER A - full-text verification]; template: Espoo — a data center covers 40% of the network's annual demand [TIER C].
- **Demand:** entry of a heat-reuse analysis (or a justification of its absence) into the EIA report scope before it is filed; the investor's declaration whether it will consider a heat supply contract with PEC/PGE for the city; the gmina's position as future party to the environmental decision.
- **Why it matters:** this is the project's largest potential positive externality — a multiple of the city's heat needs; if nobody balances it at 500 MW, it is a sign nobody is running balances at all.

Q87. Documenting the "cycle of meetings": minutes, recordings, publication of answers.

- **Basis:** the cycle's first duty hour (1 September 2026) delivered the fourth technology description only orally — residents' account, recording pending [UNVERIFIED]; invitation only on Facebook (roughly 26 hours before the meeting), the graphic card without a date or logo; formal consultations closed 28 August 2026 — four days before this duty hour, responses to formal comments are to arrive in writing.

- **Demand:** publication after each duty hour of the cycle: minutes or a recording, the presentation and an outline of the answers given (BIP or the project website), with the legal form of the cycle marked (investor information meetings — not statutory consultations) and an indication of who is responsible for documenting them; and announcing future duty hours at least a week in advance (the first was announced roughly 26 hours before it began).
- **Why it matters:** oral information without an archive cannot be verified and binds no one; since the series is announced as a "cycle", its documentation should be permanent — not dependent on whether residents bring a voice recorder.

Prepared as a community accountability tool. Every question cites a specific Bełchatów artifact. The [COMPUTED - UNVERIFIED pending capacity-factor disclosure] flag on the carbon figure (Q14) is preserved as required.