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*Comment Received From: Ruth Brock  
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## **Energy Developers refuse to adapt**

Please accept these comments in pdf form in place of others submitted which were duplicated and jumbled in the submission process and one that was submitted with a typo on my last name.

*Additional submitted attachment is included below.*

## Energy developers refuse to adapt

It baffles the mind how energy developers continue to propose projects that are not suitable for their chosen locations. There are many totally safe and non-toxic technologies that can be utilized for battery energy storage, but developers continue to lead with their wallets. Lithium-ion batteries have a favorable density and price tag, and Lithium Iron Phosphate have dropped even lower in price than their Lithium-ion predecessor, but while LFP may show slightly more stability when overheated, they still are capable of overheating. They react, burn, go into thermal runaway, are more prone to deflagration and are highly toxic when they burn with a higher percentage of hydrogen-based gases. There are more safe alternatives such as Iron Air, Iron Flow or Redox Flow and others which are suitable for grid scale applications and do not pose the safety or health risks to communities. But developers are putting their choices driven by profits above public safety.

There are technologies which do not utilize batteries at all, such as A-CAES (Advanced Compressed Air Energy Storage), and if the CEC would deny dangerous lithium-based battery storage projects that are sited near communities, such as many local AHJs have done due to community safety concerns, then these alternatives technologies would be incentivized and developers would bring forth projects that are going to safely help us achieve our green energy goals.

These Lithium-based battery storage projects are seeking locations in close proximity to substations for easy connectivity. The shorter the distance to interconnect, the less money they need to spend on their gen-tie line. Their project could be sited many miles away, could easily tap in and interconnect and have very little additional energy loss over the high transmission voltages. Losses can be mitigated by storing energy during the optimal off-peak hours when renewables are generating and there is less congestion on transmission lines. The practice of energy arbitrage can maximize their profits. Most of the energy loss in the storage process is due to transforming and inverting the energy, not the journey over high transmission voltages.

Will the CEC do right by the people of CA who say they do not want fire-prone, toxic battery storage in their communities? Do not allow these risky projects to be sited where the developers needs come before residents health & safety. Encourage the safe alternative technologies in those locations. Otherwise these Lithium-ion and LFP BESS will continue to be opposed, denied and challenged in court---ultimately delaying our state's clean energy goals.