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Formal Opposition to Compass Energy Storage Project (TN 246516) and Proposal for Safer Siting at San Onofre (SONGS)

Dear Commissioners,

I am writing to express my strong opposition to the proposed Compass Energy Storage Project in San Juan Capistrano (TN 246516) and to urge the Commission to consider relocating this facility to the San Onofre Nuclear Generating Station (SONGS) site.

The current proposal poses unacceptable risks to public safety and violates emerging best practices for battery energy storage system (BESS) siting, while the SONGS alternative offers a far more responsible solution.

Violation of Emerging Best Practices:

1. Proximity to Homes and Sensitive Areas

The proposed Compass site is less than 1,500 feet from residential neighborhoods in Laguna Niguel, directly adjacent to homes, schools, and parks. This is in direct conflict with multiple best practice recommendations:

• San Diego County BESS Best Practices Report (2024): Recommends minimum setbacks of 50 to 100 feet between a BESS project and property lines, with additional distance from occupied structures, to reduce fire and toxic exposure risk to the public. The Compass site's proximity to dense housing falls far short of these guidelines.

• New York State Energy Research and Development Authority (NYSERDA) Model Law: Advises that BESS projects should comply with all primary structure setback requirements in local zoning regulations and be screened from adjacent properties to minimize risk and visibility impacts.

• Recent Local Actions: Following multiple BESS fires in California, local governments—including San Diego County—have enacted interim guidelines mandating technical studies, plume modeling, and expanded safety zones to protect communities.

2. Fire and Evacuation Risks

• The site is in a High Fire Severity Zone, with a documented history of wildfires. Best practices from NYSERDA, DNV GL, and the Energy Storage Association (ESA) emphasize that BESS should not be sited in areas prone to environmental hazards such as wildfire, flooding, or untenable slopes¹.

• Local best practice reports stress the need for robust fire safety and evacuation plans, including modeling of fire and smoke spread and ensuring clear, feasible evacuation routes—requirements that are difficult to meet at the current site given its residential context and limited road access.

3. National and Industry Standards

• The National Fire Protection Association's NFPA 855 standard, now widely adopted, calls for rigorous safety measures, certified equipment, and coordination with local emergency services. However, as noted by the American Clean Power Association and in recent state-level regulations, these standards are most effective when paired with prudent siting decisions—especially adequate separation from

homes and public spaces.

• The DNV GL report, commissioned after the McMicken BESS explosion, concluded that even compliance with national codes is insufficient if projects are sited too close to populations or in high-risk areas, and it recommends additional local safety measures and setbacks.

SONGS: A Safer, More Strategic Alternative

Relocating this project to the San Onofre Nuclear Generating Station (SONGS) site would address these risks while leveraging existing infrastructure:

• Isolation from Communities: SONGS is situated on federal land within Camp Pendleton, with no residential areas within a two-mile radius, aligning with best practice recommendations for minimizing public exposure.

• Proven Grid Connectivity: SONGS hosts a 220 kV substation and multiple transmission lines, eliminating the need for new infrastructure and further reducing risks to local neighborhoods.

• Lower Fire Risk: The site is not classified as a High Fire Severity Zone, reducing the likelihood of wildfire-triggered incidents.

Requested Actions

1. Reject the current San Juan Capistrano proposal due to its clear violation of established and emerging BESS siting best practices and the attendant risks to public safety and the environment.
2. Direct the project applicant to evaluate the SONGS site as a primary alternative, leveraging its superior safety profile and grid assets.
3. Adopt formal siting guidelines for BESS facilities that mandate minimum setbacks from residential areas, prohibit placement in high fire-risk zones, and require comprehensive hazard and evacuation planning.

The Compass project's current location fails to meet the safety standards and best practices now recognized by industry, state, and local authorities. By contrast, the SONGS site offers a responsible path to meet California's energy storage needs without jeopardizing communities. I urge the Commission to act on behalf of impacted residents and prioritize this alternative.

Thank you for your consideration.

Sincerely,

John Paluka