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Reliability Concerns Highlighted by Moss Landing Events

Dear Commissioners,

I respectfully submit this letter in opposition to the proposed Corby BESS project, based on serious reliability concerns illustrated by operational challenges at the Moss Landing Energy Storage Facility—currently one of the largest BESS installations in the world.

Reliability Challenges at Moss Landing: A Snapshot

1. System Shutdowns and Overheating

Moss Landing experienced multiple high-temperature incidents post-commissioning. In September 2021 and again in February 2022, overheating led to temporary shutdowns of parts of the facility—a clear red flag regarding BESS operational dependability.

2. Major Fire Incident

On January 16, 2025, a fire broke out in Phase 1 of the Moss Landing facility, forcing evacuation of thousands, closing highways, and raising regional safety alarms .

Even after the fire subsided, smoldering pockets reignited weeks later, reinforcing concerns about persistent instability and risk.

3. Environmental and Operational Fallout

Though immediate air monitoring showed no public health threat, investigations detected elevated heavy metals in nearby soil and initiated cleanup efforts that could last months.

The facility remains offline at significant cost, illustrating how vulnerabilities undermine energy reliability when supply flexibility matters most.

4. Industry and Regulatory Reaction

Following the incident, the CPUC fast-tracked emergency safety regulations under General Order 167—C, including strengthened maintenance, emergency planning, and oversight protocols.

Implications for the Corby BESS Project

Reliability Risk: Moss Landing’s repeated outages underscore how even "state-of-the-art" BESS facilities can fail unexpectedly, compromising grid stability—especially during critical demand periods.

Emergency Preparedness: If Corby lacks equally robust safety infrastructure and

response planning, its operation could pose a threat to community safety and regional power supply.

Operational Continuity: The downtime at Moss Landing shows how failures can disrupt power delivery, leading to higher costs and erosion of stakeholder trust.

Regulatory Uncertainty: California's swift regulatory response signals that BESS projects now face evolving compliance standards, which can impact project timelines and feasibility.

Recommendations for the Commission

Given these concerns, I encourage the Commission to:

Reject the current proposal to site Corby BESS unless stringent reliability and safety standards demonstrated through Moss Landing lessons are assured.

Require a detailed reliability plan, including lessons learned from Moss Landing (e.g., cooling system safeguards, fire detection and suppression, emergency response protocols, environmental monitoring, and swift corrective actions).

Mandate a backup power and contingency strategy for any temporary operational disruptions tied to BESS outages.

Ensure compliance with the latest CPUC regulations, including updated General Order 167 and industry best practices for safe BESS operations.

California's energy transition demands clean, safe, and consistently reliable storage solutions. The Moss Landing facility's troubles remind us that large-scale BESS systems carry systemic risks that must be proactively managed. The Commission must hold the Corby project to a higher standard before granting approval.

Thank you for your thoughtful consideration.

Sincerely, Neil Serr