DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	265977
Document Title:	Report of Conversation- Coordination with Local Fire Department Regarding the Corby BESS Project DEIR
Description:	Report of Conversation- Coordination with Local Fire Department Regarding the Corby BESS Project DEIR
Filer:	Renee Longman
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	9/11/2025 11:18:41 AM
Docketed Date:	9/11/2025

PROJECT: Corby Battery Energy Storage System Project (CEC Docket #24-OPT-05)		
TELEPHONE: Microsoft Teams (Virtual)	**DATE:** September 3, 2025	**TIME:** 0200 pm to 03:20 pm
NAME: Alvin Greenberg, Ph.D. Dan Dowdy, P.E.	**WITH:** See list below	
SUBJECT: Coordination with Local Fire Department Regarding the Corby BESS Project DEIR		

A virtual meeting was held via Microsoft Teams to discuss coordination related to the Corby Battery Energy Storage System (BESS) The meeting included the following individuals:

CEC Staff
- Dan Dowdy/Dr. Alvin Greenberg who are jointly preparing the CEC section on Worker Safety/Fire Protection
- Renee Longman, AICP, Corby Project Manager
- Brett Fooks, Manager Safety and Reliability Branch
- Kaycee Chang, Supervisor CEQA Project Management Unit
- Yiming Luo, Student Assistant
- Erika Giorgi, Legal

City of Dixon Fire Department (DFD)
- Chief Randy Shafer
- Chief John Malone (ret)
- Andrew Reiwitch, City of Dixon Fire Department consultant (Bureau Veritas)
- Gregory Ledesma, City of Dixon Fire Department consultant (Bureau Veritas)

NextEra
- Scott Galati, DayZen LLC
- Stephen Ahn, NextEra Project Manager
- Nadan Omercajic, NextEra Environmental Project Manager
- Josh Adams, NextEra Fire Safety
- Adrian Elizondo, NextEra Engineering, Battery Project engineer
- Doug Urry, Tetra Tech
- Joe Harrison, Tetra Tech
- Christine Leone, counsel NextEra

Alvin Greenberg opened the meeting by welcoming participants and asking that Chief Shafer, Scott Galati, and others introduce their teams as they joined.

To frame the discussion, Alvin reminded everyone that he had circulated the applicant's Corby Response to CEC Staff Darden Final SA WS COCs, May 24 filing (TN 263284), earlier that morning. He explained that he and Dan Dowdy had reviewed the filing and it could serve as the starting point for today's discussion. If participants had other issues to raise, those could be added to the agenda. He emphasized that we are early in the process with no final conclusions yet. The intent of this conversation was to hear input from the Dixon Fire Department and the applicant. Alvin also noted that he is currently developing a staff assessment (SA) template for Worker Safety and Fire Protection (WS/FP) for all BESS projects that have submitted an application to the CEC, at Brett Fooks' direction.

Scott Galati responded that he saw this meeting as similar to a workshop: the goal was not to resolve every issue but to create a framework for CEC staff and the Fire Department to build upon. He noted that BESS projects are relatively new to the Commission, and that NextEra's approach was to start with existing conditions of certification (COCs), identify where they comply with law, and then walk through points of agreement or disagreement with rationale.

The conversation then turned to the applicant's proposed revisions to Worker Safety Condition 7, which had been adapted from the Darden project decision. Alvin invited Scott Galati to walk through the applicant's redline edits. Scott Galati began by saying that subsection (a) was acceptable as written. On subsection (b), the applicant had proposed referencing California Fire Code section 503 to clarify what "wide enough" access roads would mean. Alvin observed that CEC often prefers plain-English conditions rather than performance standards, but agreed the intent was to ensure clear fire apparatus access. Josh, speaking for the applicant, explained that section 503 defines access standards such as maximum distances, turning radii, and loops. Chief Malone added that Dixon Fire Protection District has its own local amendments, including adoption of Appendix D with additional specifics. After discussion, the group agreed it made sense to reference section 503 while also recognizing that more restrictive local amendments would apply.

On subsection (c), there was a brief note that gates could also be addressed under section 503 and its appendices. Subsection (d) led to a longer exchange. The applicant proposed adding examples such as temperature sensors and other heat detection devices, while emphasizing the need to leave room for evolving technologies. Chief Malone pointed out that gas detection can be faster than heat sensors in signaling thermal runaway. Alvin noted that toxic gas evolution can provide an earlier warning, but vendors often stress that a battery management system (BMS) can catch anomalies even earlier. Josh Adams explained that every container already has dual gas detectors, in addition to BMS shutdown functions. The discussion acknowledged that while BMS is critical, redundancy through additional sensors adds value. It was suggested that the condition could reference NFPA 72 (National Fire Alarm and Signaling Code) to ensure that whatever technology is used meets recognized standards. Brett Fooks noted that the CEC is not bound by code. If there are things Dixon Fire Protection District would like to see for your emergency response from a fire/public safety perspective, we would be interested in learning

more about that. CEC would need to review those items but can impose conditions on the project.

When the group reached subsection (e), water supply, differences emerged. The applicant objected to a 1500 gallon-per-minute requirement and instead proposed a 24,000-gallon onsite tank designed for approximately 250 gpm, primarily to protect vegetation and inverters rather than to cool BESS container adjacent to the one on fire. Josh Adams explained that testing shows propagation between containers is unlikely. Alvin raised the example of a recent Cal Fire incident involving Tesla megapacks in Monterey County, though a full report was not yet available. Chief Malone explained that Dixon Fire Department relies on NFPA 1142 (*Standard on Water Supplies for Suburban and Rural Firefighting*), which sets a 500-gpm minimum, but has also adopted Appendix B, which specifies 1500 gpm. He stressed the need to resolve the discrepancy through direct dialogue between the applicant and the fire department. Chief Shafer emphasized that there can be victims because of a fire (i.e. onsite workers) that will require an onsite water supply. Alvin reminded everyone that the CEC is not limited to the fire code and has authority to require additional protections when warranted.

Later sections of Worker Safety 7 were reviewed more briefly. On subsection (f), the applicant raised concerns about potential conflicts between closed-circuit television monitoring and Federal Energy Regulatory Commission (FERC) cybersecurity requirements. Alvin was skeptical about any FERC regulations but agreed that the language could preserve flexibility. Subsections (g) and (h) involved mostly wordsmithing. On subsection (i), the language will be revised to make clear that the project owner must fund additional fire department training and joint exercises. The applicant also proposed aligning compliance reporting with CPUC GO 167c requirements, to avoid duplicative filings; staff acknowledged the request but reserved the right to reframe wording.

The group then turned to Worker Safety Conditions 8 and 9. The applicant expressed concern that “should” provisions from NFPA standards were being treated as binding “shall” requirements. Alvin clarified that NFPA 855 contains mandatory “shall” statements that are critical for BESS projects, while NFPA 850 contains “should” provisions in the main standard. However, the annexes containing the “shall” requirements are more directed at fire departments. Staff acknowledged the confusion and committed to reworking the conditions. Brett Fooks asked the applicant whether there would be difficulty in adopting the upcoming 2026 NFPA 855 standard. Josh Adams replied that changes from the 2023 edition would be modest and that NextEra already designs to the most recent codes, so they foresaw no major issues.

Security and response times were also discussed. The applicant proposed continuous remote monitoring with on-call staff able to arrive within 60 minutes. Alvin noted that in other BESS projects, project staff had negotiated a 30-minute response time and voiced concern about longer delays. Scott Galati indicated the applicant might contract with local security to provide faster site access, even if NextEra personnel could not arrive within that timeframe.

Chief Malone emphasized again the hazards posed by toxic gases such as hydrogen fluoride, which present acute risks to firefighters. He recommended clear visual indicators, such as strobes and panels mapping out affected containers, so responders can quickly identify the location of a problem. Josh Adams explained that NextEra's systems already include horn and strobe alarms, along with monitoring panels in the substation control house that display BMS and fire system data, which can also be shared remotely.

Toward the end of the discussion, Alvin reminded participants that CEC has received hundreds of letters and petitions opposing the Corby project. He stressed that public scrutiny is intense . Chief Malone added that local weather patterns, particularly strong north-south winds, need to be considered in planning.

As the call wrapped up, participants agreed to continue refining language on Worker Safety 7 subsections b, d, and e, and to hold further discussions between NextEra and Dixon Fire Protection District on access standards, detection systems, and water supply. Staff committed to incorporating feedback into the WS/FP template for the Corby project. Alvin thanked the participants, noting the value of candid technical exchanges and the importance of collaboration as the assessment proceeds.