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Compass Facility Licensing Process Comment

As the lead agency under CEQA, the Commission is obligated to ensure that the environmental review process, including the Alternatives Analysis within the forthcoming Draft EIR for the COMPASS BESS project, is impartial and transparent. CEQA mandates that state agencies give full consideration to reasonable alternatives that could reduce or avoid adverse environmental impacts.

Publicly available materials from San Diego Gas & Electric (e.g., "Battery Energy Storage Systems and Microgrids") clearly frame BESS as a core element of their business strategy. Given that BESS projects, including COMPASS, may align with SDG&E's business objectives and the CEC has approved similar projects in the past there is a valid concern that the Alternatives Study could be perceived as aligned with the project proponents, rather than an impartial evaluation.

To maintain public trust and compliance with the spirit and letter of CEQA, I urge the CEC to commission the Alternatives Analysis through an independent third party, unaffiliated with CEC, SDG&E, ENGIE North America, Broad Reach Power, Saddleback Church, or any other involved stakeholders. Suitable candidates might include technically competent engineering firms with no project ties (e.g., Bechtel, for example), or even a sister agency from another state that brings regulatory expertise but no vested interest in the outcome. I do wish to note that I have no current, past or contemplated employment or consulting connection to Bechtel and proposed them solely as there is no evidence I could locate of their past interest in Compass BESS project.

Ensuring an independent analysis will strengthen the integrity of the EIR process and support a more credible and balanced decision-making framework.