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Deficiencies in Alternatives Analysis-Lambie Industrial Park

Please accept the attached letter and Attachment A for inclusion in the docket for 24-OPT-05 (Corby Battery Energy Storage System). The letter addresses deficiencies in the Alternatives Analysis and the feasibility of Lambie Industrial Park as an alternative site. Thank you for your consideration.

Additional submitted attachment is included below.

October 11, 2025

California Energy Commission

1516 Ninth Street

Sacramento, CA 95814

Re: Corby Battery Energy Storage System (24-OPT-05) — Deficiencies in Alternatives Analysis and Feasibility of Lambie Industrial Park

I submit these comments regarding the Alternatives Analysis for the Corby Battery Energy Storage System (BESS) (Docket 24-OPT-05). The applicant's most recent filing—Data Request Response #4 (docketed September 5, 2025)—asserts that Lambie Industrial Park (LIP) is not a suitable alternative location. Based on the public record and the Commission's own data requests, this conclusion is unsupported and inconsistent with CEQA's requirement to examine a reasonable range of feasible alternatives that could avoid or substantially lessen significant impacts.

1. Industrial setting with proven grid assets

LIP is an established industrial energy node that already hosts the Lambie Energy Center, a permitted 47 MW gas peaker interconnected at PG&E's 230 kV system. This demonstrates both (a) land-use compatibility for large energy infrastructure, and (b) the existence of transmission-class facilities that could support BESS. The applicant's blanket dismissal of LIP on grid feasibility grounds is not credible and ignores existing assets if connected to existing infrastructure.

2. Avoids prime farmland conversion and reduces gen-tie impacts

CEC staff's July 25, 2025 data request explicitly emphasized identifying sites that would reduce gen-tie length and avoid sensitive agricultural and biological resources. The proposed Kilkenny/Byrnes site would convert Important Farmland and requires construction of a ~1.1-mile 230 kV gen-tie crossing near Interstate 80. In contrast, a facility located within or adjacent to LIP's industrial footprint would minimize farmland conversion, reduce construction footprint, and likely shorten or eliminate the gen-tie entirely.

3. Improves public-safety posture versus the I-80/I-505 corridor

Multiple docketed comments highlight the serious public-safety risks of siting the Corby project immediately adjacent to the I-80/I-505 interchange—particularly in the event of a thermal-runaway incident, plume event, or evacuation. An industrial-park location like LIP, separated from major freeways and dense residential clusters, would significantly reduce these risks and better align with local land-use planning.

4. Consistency with county and community siting input

Solano County's public engagement has repeatedly identified Lambie Industrial Park as a preferred location type for large energy storage projects. It is already zoned and planned for industrial use, hosts existing energy infrastructure, and is away from sensitive residential and agricultural receptors. The applicant's analysis fails to engage with this clear local guidance.

5. Applicant's Alternatives showing remains incomplete

CEC staff directed the applicant to produce a robust alternatives analysis, including non-lithium chemistries. Public comments filed on September 20, 2025, identified deficiencies and inaccuracies in the Alternatives section of Data Request Response #3. Unless the applicant objectively evaluates Lambie Industrial Park against standard siting criteria—including parcel availability, zoning, floodplain characteristics, biological buffers, and air district considerations—the Commission cannot reasonably conclude that the site is infeasible.

Request

I respectfully request that the Commission:

1. Direct the applicant to fully analyze Lambie Industrial Park as a site alternative, applying the same engineering, economic, and environmental criteria used for the proposed Kilkenny/Byrnes site.
2. Require a side-by-side comparison of the proposed site and LIP (see Attachment A), including gen-tie length, farmland conversion, sensitive species conflicts, floodplains, emergency-response access, air district jurisdiction, and distance to residential receptors and freeway interchanges.
3. Update the Alternatives analysis in the environmental document to incorporate staff's July 25, 2025 data request and correct the deficiencies identified in public comments.
4. Consider LIP—or a comparable industrial node—to be environmentally superior if the analysis confirms reduced farmland conversion, improved public-safety posture, and fewer environmental conflicts.

California needs new storage, but it must be well-sited. Lambie Industrial Park appears to offer a more compatible industrial location with existing grid infrastructure and fewer land-use and public-safety conflicts. I urge the Commission to ensure that the Alternatives analysis fully and fairly reflects this.

Sincerely,

Michael Geller
Homeowner

Attachment A — Comparison of Alternative Sites

Criteria	Kilkenny / Byrnes Site	Lambie Industrial Park (LIP)
Land Use / Zoning	Zoned Agricultural; outside city limits; surrounded by farmland and scattered residences	Zoned Industrial; within established industrial corridor along SR-12
Existing Grid Infrastructure	Requires ~1.1-mile new 230 kV gen-tie to PG&E Vaca-Dixon	Adjacent to Lambie Energy Center (47 MW) with existing 230 kV PG&E interconnection
Farmland Conversion	Important Farmland; permanent conversion of ~40 acres	No prime farmland conversion; already developed/industrial
Emergency Response / Public Safety	Adjacent to I-80/I-505 interchange; plume or evacuation could disrupt major transportation	Industrial location away from major freeways; improved emergency access and plume management
Biological / Environmental Sensitivity	Raptor foraging habitat; ag land with sensitive species	Industrial context with fewer biological conflicts
Local Planning Alignment	Opposed by county ordinance (BESS moratorium); conflicts with General Plan	Identified in local discussions as more suitable industrial location
Transmission Construction Impacts	New overhead/underground 230 kV line; visual, ROW, farmland impacts	Likely minimal or none; existing substation interconnection
Community Compatibility	Proximity to rural residences; high public opposition	Industrial park context; lower residential interface