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Corby Support- CA Energy Storage Alliance

Additional submitted attachment is included below.

October 30, 2025

California Energy Commission
715 P Street
Sacramento, California 95814

RE: Informational and Environmental Scoping Meeting for Proposed Energy Storage Project (Docket Number 24-OPT-05)

On behalf of the California Energy Storage Alliance (CESA), I write to express CESA's strong support for the Corby Energy Storage Project, a 300-megawatt battery energy storage system (BESS) proposed by NextEra Energy Resources in Solano County. This project exemplifies the type of clean energy infrastructure that is essential to achieving California's reliability, decarbonization, and economic development goals.

CESA is a 501(c)(6) membership-based advocacy group committed to advancing the role of energy storage in the electric power sector. We strive to advance a more affordable, efficient, reliable, safe, and sustainable electric power system for all Californians.

Energy storage is essential for maintaining a reliable grid.

BESS is a crucial piece of the energy mix for California and local jurisdictions to meet their electric reliability and decarbonization goals. The thousands of megawatts (MW) of energy storage deployed since 2020 have played a critical role in preventing grid emergencies, despite 2024 being the hottest summer in California history.¹ However, much more energy storage is needed. Thousands of additional MW of BESS will be necessary in the next few years to meet load growth due to electric vehicles and data centers while also retiring thousands of MW of nuclear and ocean-cooled gas-fired power plants.

Energy storage plays a key role in meeting state and local environmental goals.

BESS will play a critical role in helping the state and local governments meet local and statewide climate and clean energy goals. The Governor's Office estimates the state will need 52,000 MW of energy storage by 2045 to accomplish our greenhouse gas mitigation goals, but only 16,000 MW are currently operational.² Attaining these goals, which will help mitigate the negative impact of fires, droughts, and floods due to climate change, depends on the aggressive deployment of BESS to store renewable energy for use when customers need it.

¹ Storrow, Benjamin. "What Heatwave? Batteries Keep the Lights on in California." E&E News. September 10, 2024. <https://www.eenews.net/articles/what-heat-wave-batteries-keep-the-lights-on-in-california-2/>

² California Energy Commission. California Energy Storage System Survey. Data updated April 3, 2025. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-storage-system-survey>

Safety is a key feature of BESS.

California has deployed nearly 16,000 megawatts (MW) of energy storage, including 214 utility-scale facilities and over 250,000 customer-sited systems at residential, commercial, and industrial locations.³ Although a few incidents of overheating or thermal runaway have occurred in California since 2021, they have resulted in no injuries or damage to structures beyond the BESS facilities.

The incident in Moss Landing brought additional attention to the public health and safety impacts of BESS. However, the U.S. Environmental Protection Agency determined there was no risk to public health from air emissions, and testing of drinking water sources, surface water, and agricultural soils in the area have found no concentrations of metals or other contaminants that exceed public health thresholds.⁴

In contrast to some older BESS facilities, current BESS technologies are less susceptible to thermal runaway and projects are now designed using modular containers of batteries rather than stacking batteries in large, warehouse-type structures. The containerized design inherently limits the potential severity of BESS incidents because fires rarely propagate beyond one container. If a fire does occur at a containerized facility, it will be limited to less than two percent of the battery capacity consumed in the Moss Landing fire.⁵

Additionally, several bills passed since the construction of Moss Landing have updated the safety standards that BESS developers must meet and increased regulatory oversight of their operations. CESA supported Senate Bill 38 (Laird, Chapter 377, 2023), a law that requires BESS owners and operators to work with local jurisdictions to develop comprehensive safety plans. The California Public Utilities Commission recently adopted rules for a BESS auditing and inspection program pursuant to Senate Bill 1383 (Hueso, Chapter 725, 2022). Most recently, the Legislature passed, and the Governor signed Senate Bill 283 (Laird, Chapter 407, 2025), a bill that requires consultation with local fire authorities as well as inspections prior to the operation of a BESS facility. Together, these requirements ensure that BESS facilities adhere to the highest safety standards and that adequate safety protocols are in place.

Local Benefits of Storage

Beyond its system-level benefits, the Corby Energy Storage Project will bring significant local economic value to Solano County, including the creation of construction and operational jobs and the generation of millions of dollars in local property tax revenues

³ California Energy Commission. California Energy Storage System Survey. Data updated April 3, 2025. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-storage-system-survey>

⁴ California Energy Storage Alliance. Studies of Battery Storage Fires Show No Public Health Impact. <https://40108211.fs1.hubspotusercontent-na1.net/hubfs/40108211/safety/CESA%20Fact%20Sheet%202025%20-%20Environmental%20Public%20Health%20-%20ISSUU.pdf>

⁵ California Energy Storage Alliance. Battery Energy Storage Technologies and Safety Standards Are Constantly Improving. <https://40108211.fs1.hubspotusercontent-na1.net/hubfs/40108211/safety/Evolution%20of%20BESS%20Tech%20and%20Standards.pdf>

that will support community services, schools, and public infrastructure in addition to the project's proposed Community Benefits package.

While the Corby project application is under consideration by the CEC, Solano County only recently lifted its moratorium on battery energy storage system (BESS) projects. CESA participated actively in the County's BESS Working Group and collaborated closely with County staff to help develop reasonable, balanced regulations that will enable future projects to be permitted locally. Although these regulations are still under review, CESA believes that the Corby Energy Storage Project is generally consistent with many of the provisions of the proposed ordinance, including anticipated setback requirements, and safety standards.

We respectfully urge the Commission to recognize the substantial reliability, economic, and environmental benefits of the Corby Energy Storage Project and to support its timely advancement through the CEC's permitting process.

Thank you for your consideration and continued leadership in enabling California's clean energy future. If you have any questions, please contact me at scott@storagealliance.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'SM' or 'Scott Murtishaw' in a stylized cursive script.

Scott Murtishaw
Executive Director, CESA