

DOCKETED

Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	267476
Document Title:	Valerie Estrella Comments - Battery storage comment
Description:	N/A
Filer:	System
Organization:	Valerie Estrella
Submitter Role:	Public
Submission Date:	11/15/2025 3:40:33 PM
Docketed Date:	11/17/2025

Comment Received From: Valerie Estrella
Submitted On: 11/15/2025
Docket Number: 24-OPT-05

Battery storage comment

The Moss Landing Fire: A Stark Reminder

â€¢ The Moss Landing BESS fire serves as a critical and stark reminder that we do not yet fully understand or control all the risks associated with large-scale battery energy storage systems.

â€¢ The incident highlights that current safety protocols and technology, even in massive installations, are not infallible.

â€¢ This real-world failure should prompt a precautionary and conservative approach to the approval of the Corby Project.

Inherent Risk of Thermal Runaway

â€¢ While newer BESS containers and designs are generally safer, they are not 100% safe.

â€¢ The fundamental risk lies in the lithium-ion batteries themselves, which are inherently capable of thermal runaway.

â€¢ Thermal runaway is a chain reaction that can be initiated by manufacturing defects, external damage, or overcharging, and it is extremely difficult to stop once started, leading to fire and the release of toxic gases.

â€¢ This is a physical and chemical reality of the technology that cannot be engineered away entirely, only mitigated.

Planning for Fire, Not Just Preventing It

â€¢ Given the track record and the inherent risk, the Corby Project's planning must not assume zero risk of a BESS fire.

â€¢ We must shift from a focus solely on preventing fires to planning for them to occur.

â€¢ The CEC should require robust, community-focused contingency plans that account for the realistic possibility of a significant BESS fire at the Corby site, including:

â€¢ Detailed strategies for emergency response and extinguishment (considering water limitations and specialized techniques).

â€¢ Clear protocols for public notification and evacuation in the event of toxic smoke release.

â€¢ Mandated separation/setback distances from homes, businesses, and critical infrastructure that adequately address the scale of a potential thermal runaway event.

Conclusion: Exercise Caution

â€¢ Until the industry develops systems with proven, zero-fire risk technology (or truly effective and immediate thermal runaway cessation mechanisms), the CEC must prioritize public safety.

â€¢ Approving this project without fully addressing the demonstrated safety gaps seen at Moss Landing and elsewhere is an unacceptable risk to the local community and environment.