DOCKETED	
Docket Number:	24-OPT-04
Project Title:	Potentia-Viridi Battery Energy Storage System
TN #:	268263
Document Title:	Report of Conversation with Alameda County Fire Department
Description:	Report of Conversation on potential impacts on Alameda County Fire Department
Filer:	Kaycee Chang
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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CALIFORNIA ENERGY COMMISSION

REPORT OF CONVERSATION

Siting, Transmission and Environmental Protection Division		**FILE:** **n/a**
	PROJECT TITLE: **Potentia-Viridi BESS**	**Docket:** **24-OPT-04**

TECHNICAL AREA(s): Worker Safety and Fire Protection			
☐ **Telephone**	☒ **Email**	☐ **Meeting Location:** Online	
NAME(s):	Dan Jones, RCH Group (CEC Consultant)	**DATE:** 1/16/2026	**TIME:** 2:47 pm
WITH:	*Ryan Nishimoto, Deputy Chief, Operations, Alameda County Fire Department*		
SUBJECT:	*Potential Impacts on Alameda County Fire Department*		

COMMENTS:

CEC consultant staff submitted a questionnaire regarding fire protection and response to the Alameda County Fire Department and received the attached response.

cc: *Eric Veerkamp, Project Manager*	**Signed:**  **Name**: Dan Jones

Information Request – Potentia-Viridi BESS Project – Fire Protection

As per AB 205, the Opt-in process designates the California Energy Commission (CEC) as the Lead Agency to prepare and publish the environmental analysis as per CEQA. The CEC must conduct this review before either issuing a license to construct or denying the license. All agencies and entities with an interest in a project must be notified and their opinion solicited on any subject matter in which they wish to opine. A combined Preliminary Staff Assessment (PSA) and Draft Environmental Impact Report (DEIR) must be prepared and presented to all parties and published for a 30-day public comment period, after which a Public Meeting will be held. All comments must be considered and responded to, although similar comments may be grouped under one heading. The five Commissioners, appointed by the Governor, will make the decision. Staff will make a recommendation and will propose mitigation in all subject matter topics as appropriate.

On the topic of Worker Safety and Fire Protection for the Potentia-Viridi (PoVi) Battery Energy Storage System (BESS) Project (24-OPT-04), Staff have the following questions regarding Fire Protection and EMS response (which also includes hazmat response, if any, and rescue):

1. If the project were to be approved and built, which ACFD station(s) would respond to:
    a. A fire incident at the BESS facility? This area is primarily covered by Alameda County Fire Department (ACFD) Engine 8, which is housed at Fire Station 20 located at 7000 East Avenue in Livermore. A fire incident may also include units from South San Joaquin County Fire Authority, Livermore-Pleasanton Fire Department, and Cal Fire based on mutual aid availability.
    b. An EMS incident at the BESS facility? ACFD Engine 8
    c. A hazmat spill or a rescue at the BESS facility? ACFD Fire Stations 12, 20, 24, and 25

2. What would be the estimated response times for fire, EMS, and hazmat spill or rescue? Approximately 30 minutes depending on time of day and traffic conditions. South Sa Joaquin County Fire Authority may be a slightly faster response due to traffic conditions and distance, but that's a mutual aid request based on willingness and availability.

3. Is current full-time and volunteer firefighter staffing at the stations that would respond to these incidents at the BESS facility up to your standards? Yes, for all ACFD Fire Stations.

4. What complement of engines, trucks, water tenders, EMS vehicles, Chief's trucks/cars exist at the responding stations? Station 20 (E8, E20, T20, HM20,

Battalion 3), Station 16 (E616 and WT16), Station 25 (E25, T25, HM25, Battalion 2), Station 24 (E24, Rescue 24), Station 12 (E12, T12, HM12, Battalion 4), Station 17 (E617, Dozer 17, E17), Station 18 (E18). Your back-up stations? Back up stations include all other remaining ACFD Fire Stations and one Livermore-Pleasanton Fire Station assigned as automatic aid. Are your Automatic Aid or Mutual Aid from other departments for response or in-fill adequate? Yes, for types of apparatus availability and capability. No, regarding response times due to fire station locations of all ACFD and mutual aid partners.

5. Both BESS suppliers being considered by the project applicant utilize passive thermal runaway protection methods (i.e. insulation between cells/modules) and no active fire suppression systems are provided because the BESS units are non-walk-in enclosures. However, test results demonstrate that a suppression system is not required to stop the spread of fire from cell to cell, module to module or cabinet to cabinet. Both BESS suppliers, however, include an active explosion control system (sparkers or active ventilation) and passive deflagration panels.
Additionally, two 30,000-gallon water tanks for emergency use would be installed on the project site (one in the northeastern corner of the site and one in the southwestern corner of the site). The water tanks would provide storage of water used for fire suppression and container cooling. The tank would not require a regular supply of water because the water would be withdrawn only in the event of a fire. The tank would be monitored periodically and refilled as needed to replace evaporative losses.

   Three O&M buildings are proposed (4,800 square feet each) therefore sprinkler systems would not be provided. These buildings would be equipped with portable fire extinguishers. These O&M buildings are proposed in the northeastern corner of the site within approximately 100 feet of one of the 30,000-gallon water tanks.

   Are you satisfied with the fire prevention and suppression features included in the project? If not, what recommendations do you have? I would recommend having two fire hydrants, one located at each access point, and regular clearance of vegetation around the entire property. I would also recommend as much distance between modules as needed to prevent direct and radiant heat transfer from one unit to another to avoid adjacent modules' batteries going into thermal runaway. Any lithium-ion/BESS firefighting materials available on site such as thermal blankets, moveable barriers to reduce direct and radiant heat transfer between modules, etc. would be helpful at reducing fire spread. Having emergency contact information regularly updated through our dispatch center and a guaranteed after-hours response time for a responsible party would be helpful too.

6. Energy Commission Staff are required to propose mitigation if an impact is identified that requires mitigation. Given your experience and position, Staff is asking for your frank assessment of what impacts to your ability to respond to emergencies might be presented by the construction and operation of this BESS project. Please offer your assessment on all impacts and potential impacts, including draw-down of equipment and staff. Aside from the draw-down of equipment, firefighting resources related to hazardous materials and fire mitigation, and post incident decontamination costs from exposure to lithium-ion fires are very impactful financially. Fires at BESS also tend to be long duration incidents which compounds the financial impacts in contrast to fires at ordinary construction residential and business structures.

7. Staff are also required to assess the "cumulative impact" of adding this BESS project to others that have either been approved or are in the planning stage.

    a. Do you have any comments on any proposed projects that you are aware of in your jurisdiction, either individually or in combination with, the proposed BESS project, that could cause a significant cumulative impact? No

    b. Specifically, do you have any concerns about battery energy storage facilities, or the placement of one at the proposed project site? Cost recovery for equipment, PPE, supplies, injuries/exposures, etc. are a significant concern. Also, the inability to rapidly mitigate lithium-ion battery fires at BESS facilities once thermal runaway exists and spreads from one area to the next and the toxic biproducts and potential long-term effects to the community, environment, and first responders.

    c. Does your command region have any experience with responding to emergencies at battery energy storge systems? Limited to small lithium-ion battery banks such as at commercial buildings' back-up power walls.

Thank you for the opportunity to comment,
Ryan Nishimoto, Deputy Chief of Operations
Alameda County Fire Department.