

**DOCKETED**

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*Comment Received From: Derek Johnson  
Submitted On: 2/16/2026  
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**Letter in Opposition to Vaca-Dixon And Cumulative Impacts of Multiple BESS Applications**

*Additional submitted attachment is included below.*

February 16, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

Re: Opposition to the Vaca-Dixon Power Center (Docket 26-OPT-01)

Dear Honorable Commissioners,

I respectfully submit this comment urging the California Energy Commission (CEC) to deny the application for the Vaca-Dixon Power Center. When evaluated against the CEC's core responsibilities - advancing state energy policy, ensuring safety, supporting innovation, and protecting communities - the proposed project presents unacceptable cumulative risks, unnecessary technological hazards, and a disproportionate burden on a single community – namely Vacaville.

This conclusion becomes even clearer when the Vaca-Dixon proposal is considered alongside the Corby BESS project, which is simultaneously seeking approval in the same regional footprint just outside Vacaville's city limits in rural Solano County.

### **Cumulative Impacts: Two Large Lithium-Ion Facilities in One Community**

The Vaca-Dixon Power Center (157 MW / 457 MWh) and the Corby BESS (300 MW / 1,200 MWh) together would concentrate over 1.6 GWh of lithium-ion storage in and around the same neighborhoods, transportation corridors, and emergency-response districts.

This clustering creates a cumulative-risk profile that is far greater than the sum of its parts:

- The same shared emergency-response resources for two high-hazard facilities.
- Overlapping plume, evacuation, and shelter-in-place zones.
- Increased probability of at least one major incident over the two projects' lifetimes.
- Compounded impacts on the same residents, schools, hospitals, businesses, and transportation infrastructure (Interstates 80 and 505).

CEC's responsibility for safe siting cannot be met with a second lithium-ion facility in a community already facing the risks of the first one under review.

### **Both Vacaville and Solano County Allow Non-Lithium-Ion Technologies**

Both the City of Vacaville's draft BESS ordinance – slated to be heard by our City Council on March 10 - and Solano County's adopted BESS ordinance allow non-lithium-ion battery technologies - including flow batteries, iron-air, zinc-hybrid, and sodium-sulfur systems - while

restricting (Solano County's ordinance) or prohibiting (Vacaville's draft ordinance) lithium-ion due to its well-documented fire and toxic-gas hazards.

This is a critical point:

- The community *is not* opposed to energy storage.
- The community *is opposed* to the lithium-ion risk in populated areas.
- The applicant has safer, locally permissible alternatives but chooses not to use them, just as the applicant in Corby chose not to.

If CEC policy encourages alignment with local planning, approving a lithium-ion project where both jurisdictions have clearly signaled that safer chemistries are preferred and allowed would undermine that policy.

### **Disproportionate Burden on a Single Community**

The neighborhoods surrounding the Vaca-Dixon PG&E substation would bear the brunt of:

- Two large lithium-ion facilities.
- Elevated fire and toxic-plume risk.
- Potential evacuation or shelter-in-place events.
- Proximity to I-80 and I-505, both critical evacuation, freight, and commute corridors.
- Impacts to Kaiser Vacaville, NorthBay VacaValley Hospital, schools, and childcare centers.
- Potential large-scale incidents at one, the other, or both concurrently, placing additional burdens on residents, businesses, major medical care centers, and first responders.

CEC's responsibility to avoid disproportionate impacts is clear: no single community should be asked to host multiple high-hazard lithium-ion facilities when *both* safer technologies *and* safer locations exist.

### **Safer, Lower-Conflict Locations Exist Elsewhere in Solano County**

Solano County contains multiple remote, industrial, sparsely populated areas—including the Montezuma Hills region—where large-scale storage can be sited with:

- Minimal population exposure.
- Reduced emergency-response burden.
- Direct adjacency to renewable generation.
- Strong alignment with county and city policy.
- Economies of scale and partnership opportunities between BESS developers, one of whom – NextEra – already operates the windmill farm.

CEC's siting mandate requires selecting least-conflict locations when they are available. In this case, they clearly are.

## **Lithium-Ion Hazards Are Incompatible with the Local Context**

Lithium-ion battery systems carry inherent risks:

- Thermal runaway.
- Self-sustaining fires that can burn for days.
- Toxic fluorinated gas emissions, including HF.
- Massive water requirements for keeping nearby units cool during a thermal runaway event.
- Cascading failure potential across containerized units.

The applicant has not demonstrated that local fire agencies possess the equipment, training, or water supply to manage a large-scale lithium-ion incident - let alone two such facilities in the same region.

CEC's emergency-preparedness responsibility requires avoiding the creation of new, unmanageable hazards.

### **Conclusion: The CEC Must Deny the Vaca-Dixon Power Center**

When viewed through the lens of the CEC's core responsibilities, the Vaca-Dixon Power Center:

- Creates unacceptable cumulative impacts when combined with the Corby BESS. Though two different applicants, they cannot be considered as if neither existed, nor can either be ignored in light of other developers who may covet more BESS development in the same general area.
- Imposes a disproportionate burden on one community.
- Ignores the availability of safer, locally allowed non-lithium technologies.
- Contradicts local planning direction and expertise.
- Introduces new emergency-response and public-safety risks.
- Can be sited in safer, lower-conflict areas within Solano County

For these reasons, I respectfully urge the Commission to deny the application for the Vaca-Dixon Power Center.

Thank you for your consideration and for your commitment to responsible, common-sense community-protective (and centered) energy planning in California.

Sincerely,

Derek Johnson  
Vacaville, California